BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM MUNDELL
Commissioner

IN THE MATTER OF THE INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271(C) OF THE TELECOMMUNICATIONS ACT OF 1996

DOCKET NO. T-00000B-97-0238

SUMMARY BRIEF IN SUPPORT OF U S WEST COMMUNICATIONS, NC.'S APPLICATION UNDER § 271 OF THE TELECOMMUNICATIONS ACT OF 1996; CHECKLIST ITEMS 1, 11 AND 14-INTERCONNECTION, NUMBER PORTABILITY AND RESALE

Introduction and Overview

U S WEST Communications, Inc. (U S WEST), has submitted the Affidavits of Thomas R. Freeberg, Michael J. Weidenbach, Margaret Bumgarner, and Lori A. Simpson to provide the factual information necessary to establish that U S WEST continues to satisfy the requirements of Checklist Items One (Interconnection), Eleven (Number Portability) and Fourteen (Resale). This brief will provide the regulatory context for these submissions, and summarize them briefly.

Checklist Item One: Interconnection and Collocation

Overview

Section 271(c)(2)(B)(i) of the Act requires U S WEST to provide "[i]nterconnection in accordance with the requirements of sections 251(c)(2) and 252(d)(1)."[1] Section 251(c)(2) requires an incumbent local exchange carrier (LEC) "to provide, for the facilities and equipment of any requesting telecommunications carrier, interconnection with the local exchange carrier's network . . . for the transmission and routing of telephone exchange service and exchange access."[2]

1 47 U.S.C. § 271(c)(2)(B)(i); *see Second BellSouth Louisiana Order*, 13 FCC Rcd at 20640-20642; *Ameritech Michigan Order*, 12 FCC Rcd at 20662-63.

2 47 U.S.C. § 251(c)(2)(A).

Under Section 251, as an incumbent LEC, U S WEST has three essential obligations:

- Provide interconnection "at any technically feasible point within the carrier's network."[3]
- Provide interconnection that is "at least equal in quality to that provided by the local exchange carrier to itself."[4]
- Provide interconnection "on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, in accordance with the terms of the agreement and the requirements of [section 251] and section 252."[5]

U S WEST legally obligates itself to fulfilling these provisions through numerous interconnection agreements and through its Statement of Generally Acceptable Terms (SGAT – a revised version of which was filed with the Commission on April 7, 2000), as well as the bona fide request (BFR) process. U S WEST has implemented the terms of the SGAT through a series of processes described herein.

Further, U S WEST tracks how well it provides checklist item number one through a series of performance indicator definitions (PIDs), created and agreed to in this Arizona 271 docket. The actual performance data flowing from these PIDs establish that U S WEST is providing interconnection in a manner that is equal to, and in many instances higher than, the quality it provides similar services to itself. Finally, and perhaps most significantly, the scope and extent of actual competitive activities provide powerful evidence that U S WEST is committed to competition, and that competition is in fact occurring at an impressive and rapidly increasing rate.

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3 47 U.S.C. § 251(c)(2)(B). In the *Local Competition First Report and Order*, the Commission identified a minimum set of technically feasible points of interconnection. *See Local Competition First Report and Order*, 11 FCC Rcd at 15607-09.

4 47 U.S.C. § 251(c)(2)(C).

5 *Id.*§ 251(c)(2)(D).

The Affidavits of Michael J. Weidenbach and Thomas Freeberg set forth more fully the specific factual basis for demonstrating how U S WEST meets Checklist Item One. This testimony is briefly summarized as follows:

Tangible Components of Interconnection

Interconnection provides the means to connect the U S WEST network with the network of a CLEC for the mutual exchange of traffic. U S WEST makes available four standard interconnection arrangements to CLECs: collocation (five forms of physical[6], and two forms of virtual)[7]; mid-span meet; entrance facility; and, interLocal Calling Area (LCA) facility.[8]

The Process for Providing Interconnection

Section 7 of the SGAT (less section 7.3, which concerns reciprocal compensation) describes how U S WEST interconnects its network with CLEC networks to exchange local traffic, and provides the structure for how these various alternatives are made available to CLECs[9]. More specifically, the SGAT creates the legal obligation of U S WEST to provide

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6 **Caged Physical** -- CLEC places its equipment within U S WEST's building surrounded by a secure cage;
Shared Physical -- One CLEC obtains a Caged Physical Collocation arrangement from U S WEST, and a second CLEC shares the first CLEC's space;
Cageless Physical -- CLEC places its equipment in the U S WEST central office, without the need for a secure cage;
ICDF Collocation -- Provided to CLECs that do not require active equipment in the U S WEST central office building, but require access to unbundled network elements for the purpose of combining;
Common Area Splitter Collocation -- Similar to ICDF collocation, this allows a CLEC to place Digital Subscriber Line (DSL) "splitters" on common floor space in a U S WEST central office building.
Affidavit of Thomas R. Freeberg, pp. 22-23.

7 **Standard Virtual** – CLEC delivers equipment to U S WEST for ILEC engineering, installation, and maintenance on behalf of the CLEC, principally used when there is no space for physical collocation.
Adjacent -- When space is unavailable within a U S WEST central office building, CLEC uses adjacent controlled environmental vaults owned by U S WEST or constructed or procured by a CLEC and placed on U S WEST property.
Affidavit of Thomas R. Freeberg, pp. 22-23.

8 *See generally* Affidavit of Thomas R. Freeberg, pp. 22-23.

9 The actual process flows for interconnection can be found in the Exhibits to Mr. Weidenbach's Affidavit, including end-to-end process flows and task lists for ordering and provisioning (MJW-02, MJW-03), and for repair (MJW-04, MJW-05).

interconnection at the six key points of interconnection.[10] The SGAT sets forth the responsibilities of both parties, starting with the joint planning meeting and the Access Service Request (ASR). The SGAT includes the following interconnection ordering process language:

> When ordering IS, the ordering Party shall specify on the Access Service Request: (ASR) 1) the type and number of Interconnection facilities to terminate at the Point of Interconnection in the Serving Wire Center; 2) the type of interoffice transport, (i.e., Direct Trunked Transport or Tandem Transmission); 3) the number of trunks to be provisioned at an end office or local tandem; and 4) any optional features. When the ordering Party requests facilities, routing, or optional features different than those determined to be available, the Parties will work cooperatively in determining an acceptable configuration, based on available facilities, equipment and routing plans.[11]

In addition to preliminary planning sessions, U S WEST and the CLECs engage in quarterly planning sessions, and provide each other with forecasts of trunk utilization, including traffic requirements for the next two years.[12] If trunk blockage occurs unexpectedly, either party can request additional trunks, although U S WEST typically defers to the CLEC's determination in this regard.[13]

Performance Measurements Demonstrate Compliance

The comprehensive offering of interconnection options set forth in the SGAT, coupled with the detailed processes and procedures U S WEST has established to provide interconnection, provide *prima* facie evidence of how U S WEST meets the applicable provisions

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[10] The six points include: 1) Line-side of a local switch; 2) Trunk-side of a local switch; 3)Trunk interconnection points for a tandem switch; 4)Central Office cross-connection points; 5) Signal Transfer Points; and, 6)Points of access to Unbundled Elements. First Interconnection Order at ¶212.

[11] SGAT, Section 7.4.1, Ordering Interconnection.

[12] *See generally* Affidavit of Thomas R. Freeberg, p. 9. a detailed discussion of how trunks are designed to avoid blockage can also be found in Mr. Freeberg's Affidavit, pp. 11-12.

[13] U S WEST typically initiates the trunk group servicing process by notifying the CLEC through a Trunk Group Servicing Request (TGSR) of the need to take action. If the CLEC agrees that blocking is excessive, it may submit an ASR. In Arizona, during the past five months U S WEST proactively notified CLECs of potential interconnection blocking through the issuance of 60 TGSRs. CLECs responded to 40% of the TGSRs by placing orders to augment or rearrange the trunk groups. However, CLECs responded to 60% of the TGSRs by declining to take corrective action. Affidavit of Thomas R. Freeberg, p. 11.

of Checklist Item One. In addition, however, parties to this docket spent considerable time developing PIDs for interconnection and collocation. The current data from these measures demonstrate, with one prior exception, that U S WEST is offering interconnection "at least equal in quality to that which U S WEST provides to itself." In past instances, the data shows that U S WEST provides CLECs with interconnection that is actually better in quality than00 that which it provides to itself.

Trunk Installation

For example, for interconnection trunks provided to CLECs, U S WEST measures several aspects of the provisioning process.[14] Specifically, U S WEST tracks the average installation interval, the percentage of time it installs a trunk on or before the due date ("commitments met"), and for installations that were not completed on time, the average number of days the trunk was installed later than the originally scheduled due date. For each of the above interconnection trunk indicators, U S WEST also collects comparable data for its own interoffice trunks to obtain comparable evidence for the internal U S WEST network.

Perhaps the most obvious performance measurement for comparing services provided is average installation interval. As Exhibit TRRS – C4 to the Affidavit of Thomas R. Freeberg demonstrates, the average installation interval U S WEST provides to CLECs is consistently better than the interval it takes for its own installations.[15] U S WEST's actual performance data on interconnection trunk installation is universally positive. The PIDs state that U S WEST meets its trunk installation obligations if it provides such installation as well as or better than retail parity. For each of the interconnection trunk installation measures, U S WEST consistently provided CLECs with better, more timely trunk installation than it did for its own retail organization. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

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14 *See generally* Affidavit of Thomas R. Freeberg, p. 6.

15 For a more detailed illustration of installation performance measures, *see* Exhibit TRFS – C4, and Affidavit of Thomas R. Freeberg, pp. 16-17.

Repair Quality

The same is true for repair quality. Using mean time to repair as a fairly representative indicator, Exhibit TRFS – C5 demonstrates that U S WEST provides CLECs with much quicker average repair times that it provides to itself.[16] Just as with trunk installation, U S WEST's actual performance data on interconnection trunk repair is universally positive. The PIDs state that U S WEST meets its trunk repair obligations if it provides such repair as well as or better than retail parity. For each of the interconnection trunk repair measures, U S WEST consistently provided CLECs with better, more timely trunk repair than it did for its own retail organization. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

Blockage

Finally, the same results demonstrating superior service to CLECs can be found in the area of trunk blockage.[17] Exhibit TRFS – C6 demonstrates that CLECs generally experience blockage in their trunks at rates significantly less than U S WEST experiences in its own tandem trunks.[18]

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16 *See generally* Affidavit of Thomas R. Freeberg, pp. 17-18, and Exhibit TRFS – C5. U S WEST tracks several aspects of the trunk repair process, including the percentage of installed trunks that have trouble ("Installation Trouble Reports"), the percentage of troubles U S WEST cleared within Four Hours, the mean time to restore trunks that were experiencing trouble, the number of times a repaired trunk must be repaired again ("Repair Repeat Report Rate"), and the percentage of the total number of trunks that experience a problem ("Trouble Report Rate"). *Id.*

17 *Id.* 15-16. U S WEST and CLEC end offices route originating calls to other end offices by two means – direct and tandem routing. Direct routing allows one end office to transport traffic directly to another end office over a single uninterrupted interoffice facility. Of the 125,000 trunks in service on May 1, 2000, approximately 75% were direct trunks. By contrast, tandem routing, allows a CLEC to send, on a single trunk group, originating calls destined for many end offices to a tandem switch. The tandem switch then relays each call to the appropriate "common" trunk group associated with a terminating end office. A "common" group concurrently carries calls originated by the retail customers of U.S. WEST and a CLEC. *Id.* U.S. WEST measures (1) interconnection final trunk groups that connect CLEC end offices with U.S. WEST tandems, and (2) interconnection final trunk groups that directly connect CLEC end offices with U.S. WEST end offices. To ensure it provides interconnection "at least equal in quality," U S WEST also measures its traditional interoffice trunk groups that connect U S WEST end offices with U S WEST tandems, as well as interoffice final trunk groups that connect one U S WEST end office to another U S WEST end office. This allows a direct comparison between the interoffice (U S WEST) direct trunks as compared to interconnection (CLEC) direct trunks as well as a second comparison of blockage experienced on interoffice tandem trunks as compared to interconnection trunks. *Id.*

18 U S WEST's actual trunk blockage performance is the only area of interconnection that provided mixed results. In this docket, the parties agreed that U S WEST met its interconnection blockage obligations if blockage

These collective results – for trunk installation, repair, and blockage – provide a complete picture of how well U S WEST is providing interconnection to CLECs. Specifically, these results demonstrate that U S WEST is providing interconnection trunking in a timely manner; that CLECs obtained interconnection trunks in quantities that generally provided nondiscriminatory trunk blockage; that the quality of interconnection trunks was high, as demonstrated by the relatively low number of trouble reports generated by CLECs; and that U S WEST's repair of interconnection trunks, when required, was also performed responsively.[19] Simply put, U S WEST provides interconnection services at levels at least equal, and in many instances significantly superior, to that which it provides similar services to itself, which is the benchmark agreed upon in the Arizona collaborative process. According to the FCC's decision in Bell Atlantic, this provides compelling proof that U S WEST has met its legal obligations under Section 271:

> [F]or those functions the BOC provides to competing carriers that are analogous to the functions a BOC provides to itself in connection with its own retail service offerings [i.e., resale], the BOC must provide access to competing carriers in "substantially the same time and manner" as it provides to itself. Thus, where a retail analogue exists, a BOC must provide access that is equal to (i.e., substantially the same as) the level of access that the BOC provides itself, its customers, or its affiliates, in terms of quality, accuracy and timeliness.[20]

In analyzing Bell Atlantic New York's performance measures, the FCC held that "to the extent there is no statistically significant difference between Bell Atlantic's provision of service

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was the same or less than retail parity. In addition, even if the CLECs experience more blockage than does U S WEST, the blockage is acceptable if it is less than one percent. Blockage on tandem trunks (NI-1) shows that CLECs have experienced less blockage on such trunks than has U S WEST. Because U S WEST has met the Commission's benchmark on this measure, no Commission analysis is required. Blockage on end-office trunks (NI-2), however, shows a different result. On end office trunks, CLECs experienced higher blockage than did U S WEST and the blockage exceeded one percent in each of the last three months. Because U S WEST did not meet the Commission's stated benchmark, this issue is appropriate for analysis. Affidavit of Thomas R. Freedberg, pp. 16-17.

19 The Arizona SGAT, Section 20, will eventually list the performance indicators according to checklist items, and Section 20 Exhibit B will eventually define each performance measure.

20 Bell Atlantic New York Order at ¶ 44.

to competitive LECs and its own retail customers, we [the FCC] need not look any further." [21]

Accordingly, with respect to interconnection, the performance measurements demonstrate that U S WEST meets its burden of establishing that it provides services to CLECs at a level equal in quality to that at which it provides similar services to itself.

Interconnection Trunking Summary

U S WEST satisfied each of the requirements of the Act and the FCC rules with regard to interconnection. U S WEST has a concrete and specific legal obligation to continue to provide interconnection as referenced in the SGAT and the various interconnection agreements between U S WEST and CLECs in Arizona. Checklist item is also satisfied and supported by the specific procedures U S WEST employs to implement interconnection with CLECs. U S WEST's centers that coordinated the fulfillment of interconnection service orders supported huge volumes of demand across multiple states and trained personnel exist to meet future demand for interconnection in Arizona. Finally, U S WEST tracks performance data on interconnection pursuant to the PIDs developed in this docket. This performance data, with one exception that is easily explainable, shows that U S WEST provides CLECs with interconnection equal in quality and in many instances better in quality than that which U S WEST provides to itself. U S WEST stands ready to provide additional interconnection to CLECs in Arizona in accord with the terms of the proposed U S WEST SGAT.

Collocation

The results are equally compelling for Collocation. Collocation arrangements are available at all U S WEST central office buildings. U S WEST also provides collocation at other U S WEST locations, including adjacent collocation. Further, U S WEST allows CLECs to use any collocation method used by another incumbent LEC or mandated by the Arizona Commission.[22]

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21 *Id.* at ¶ 58.

22 A detailed discussion of the FCC's requirements concerning collocation is set forth in the Affidavit of Thomas R. Freeberg, pp. 24-25.

Section 8 of the SGAT provides detailed terms and conditions, rate elements, descriptions and arrangements, and the ordering process provided by U S WEST.[23] In addition, CLECs can obtain nonstandard collocation arrangements through the Bona Fide Request (BFR) process.[24] U S WEST provides CLECs with the same network connections as U S WEST uses to provision services to its own retail customers.[25]

U S WEST offers collocation on a first-come, first-served basis.[26] If a request for collocation is denied due to lack of space, that CLEC will be offered a number of alternatives, including: (1) less space; (2) a cageless physical collocation (bay-at-a-time); or (3) virtual collocation.[27]

Five departments within U S WEST are dedicated to the collocation processes:

1. The Infrastructure Availability Center project manages each collocation order, from initial inquiry to completion.

2. The Common Systems Planning and Engineering Center provides subject matter expertise for feasibility studies.

3. The interoffice Facilities Capacity Provisioning Center is responsible for design engineering, walk-throughs, and records updating of collocation jobs.

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23 *See generally* Affidavit of Thomas R. Freeberg, p 28.

24 The BFR process is set forth in Section 17 of the SGAT. During 1999 and 2000, U S WEST received 4 BFRs requesting collocation in Arizona; three of the requests were completed by the required response date; two requests were fulfilled as requested; one was denied as not qualified under the Act, and one was denied but the CLEC accepted a tariffed alternative. *Id.* at 10.

25 Affidavit of Thomas R. Freeberg, p. 30. CLEC terminations share frame space with U S WEST terminations with no requirement to traverse an intermediate device, such as an ICDF or SPOT (Single Point of Termination) frame. A direct connection between the collocation space and the same digital cross-connect frame terminating similar retail services can be provisioned without a bona fide request. The direct connection product is described in the U S WEST Interconnection and Resale Resource Guide, Issue D of Technical Publication 77386 and in the Arizona SGAT at Section 8.2.1.24. If desired, a CLEC may request a tour of the U S WEST building and may request demarcation on various frames. For a more detailed description of the nature and extent of the collocation process, *see Id.* At pp. 23-25. *See generally* the SGAT, Section 8.2.1.24 – 8.2.1.26, CLEC Connections to the U S. WEST Network.

26 *See* the SGAT, Section 8.2.3.2, Space Allocation.

27 Affidavit of Thomas R. Freeberg, p. 30.

4. The Network Electronic Purchasing group supplies collocation services including procurement, end-to-end customer service, promise ship data, delivery confirmation and installation problem resolution.

5. Finally, a State Interconnection Manager group supports account teams when tutoring, escalation, and inspection is required. At these five departments, U S WEST dedicates over 200 employees to support collation requests. At least as many employees from other departments spend some portion of their time on collocation provisioning.

Performance Measurements For Collocation

U S WEST also measures performance for collocation,[28] including the average time it takes to provide CLECs with feasibility studies[29], quotes[30], and installations[31], and the

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[28] Unlike interconnection where there is a retail parity standard, however, U S WEST does not collocate its own central office equipment. In those instances, U S WEST must establish that it provides "an efficient CLEC with a meaningful opportunity to compete." U S WEST tracks a number of collocation results to establish that it offers collocation such that efficient competitors have a meaningful opportunity to compete. These collocation measures correspond to each of the three steps in the collocation process.

[29] Section 8.4.3.1 of the SGAT requires U S WEST to perform feasibility studies within ten days, commencing when U S WEST receives and accepts a valid/accurate collocation order, and ending when the response is provided to the CLEC. The day an order is received is day zero, with the next business day – typically when the order is reviewed and deemed valid/accurate during a validation call with the CLEC –counted as day one. If the order is deemed invalid/inaccurate, it is returned to the CLEC so that the necessary corrections can be made. Further definition of the Collocation Feasibility Interval Measure and the Collocation Feasibility Commitments Met Measure are found in exhibit TRF-C4 of the affidavit of Thomas R. Freeberg.

[30] The standard U S WEST interval for delivering CLECs with a collocation quote is twenty-five calendar days, beginning the day after U S WEST delivers the feasibility study result to the CLEC, and ending when U S WEST delivers the quote. This rule does not apply to interconnection agreements with a twenty-one day combined feasibility/quote interval, as those intervals begin when U S WEST accepts a valid order, and ends when U S WEST delivers the quote to the CLEC, Affidavit of Thomas R. Freeberg, p. 35.

[31] While there are exceptions, the standard U S WEST interval for physical and virtual collocation installation is ninety calendar days, beginning on the day U S WEST receives the 50% downpayment, and ending on the day the CLEC is notified that the U S WEST Installation Standards and associated Technical Publications requirements are met. U S WEST also tracks the percentage of time that it completes the installation on time. This collocation "Commitments Met" indicator is not reported as met until the U S WEST State Interconnection Manager conducts a "walk through" of the space and documents the CLEC's acceptance of the space. Walk-throughs typically occur the business day following the installation completion. The last component of collocation is installation of the collocation arrangement. If, during the walk-through, the CLEC does not accept the collocation, the completion date is removed to indicate that the installation is not yet complete. When the CLEC finally accepts the collocation, the actual "complete" date will be posted, and then the Commitments Met and interval measures will be calculated and reported based on the extended U S WEST interval. U S WEST has retroactively corrected completion dates to reflect any revised deviation situation that has occurred. Affidavit of Thomas R. Freeberg, p. 32.

percentage of time that those tasks are completed on or before the scheduled due date. Because there is no retail comparative, performance benchmarks have been established as that level of performance that CLECs agree would provide them with a meaningful opportunity to compete.[32] As Exhibit TRFS–C8 demonstrates, U S WEST's performance around feasibility has been excellent in both new and augmented collocation. By averaging only 9.6 days per feasibility study, and completing 98.9% within the prescribed 10-day period, U S WEST demonstrates its commitment to meeting each CLEC's needs in a timely manner. Likewise, as this Exhibit also demonstrates, U S WEST provides CLECs with collocation quotes well within the established time frame. Although permitted 25 days to formulate the quote, U S WEST is averaging a mere 15.7 days per quote and meets over 98% of all quotes within the 25 day interval.[33]

Exhibit TRFS–C7 likewise demonstrates U S WEST's exemplary performance for the installation of new and augmented collocations, specifically including the fact that U S WEST completed over 95% of all installations within the prescribed 90-day period, and that the average installation was completed 20 days prior to the due date.

The results for each of the collocation measurements of feasibility, quotes, and installation demonstrate that U S WEST consistently met or exceeded performance benchmarks set by the Commission.

Collocation Summary

U S WEST has satisfied the requirements of the Act, and the FCC with respect to collocation. U S WEST has a concrete and specific legal obligation to provide collocation as referenced in the U S WEST SGAT and the various interconnection agreements between U S WEST and the CLECs in Arizona. U S WEST has developed specific procedures to implement collocation. Utilizing hundreds of trained personnel,

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32 As in the case of retail parity, under Bell Atlantic Order at ¶ 44, if U S WEST meets or exceeds these benchmarks, the Commission has no performance issues to review, and further analysis is appropriate only if U S WEST performance falls below the benchmarks.

33 Affidavit of Thomas R. Freeberg, p. 35..

U S West's centers coordinate and fulfill the huge demand for CLEC collocation every day in Arizona. U S WEST's commitments, along with the actual PID data, provide compelling evidence that U S WEST is providing collocation to CLECs in a timely manner and in quantities that provide CLECs with a reasonable opportunity to compete.

Actual Competitive Results Provide Compelling Evidence on Checklist Item One

The best proof of U S WEST's success in meeting Checklist Item One can be found in the actual use of U S WEST's network by the CLECs. Twenty-five CLECs have taken advantage of the opportunities offered by U S WEST, deploying 225 units of physical collocation and 32 units of virtual collocation in 61 central office buildings. Over 88% of U S WEST's retail lines in Arizona were served by central offices providing collocation facilities.[34]

Similarly, as of May 1, 2000, U S WEST was providing interconnection trunking to 18 facilities-based CLECs. By May 1, 2000, U S WEST was providing service at more than 600 local interconnection trunk groups, with almost 125,000 trunks in service between U S WEST and CLECs in Arizona. These trunks were terminated to over 62 U S WEST wire centers in Arizona.[35] From January of 2000 through May of 2000, In Arizona, U S WEST installed an average of 5,500 LIS Trunks per month. Call volumes carried on these trunks are increasing every month. In February 2000, that volume was 744 million minutes. The volume increases in April 2000 to over 929 million minutes of calls exchanged over interconnection trunks.[36]

Summary of Checklist Item One

U S WEST has undertaken significant and successful efforts in order to demonstrate that it meets Checklist Item One. U S WEST has met not only the letter of Checklist Item One, as evidenced in the detailed descriptions above, but also the spirit itself, as demonstrated by the healthy and growing level of competition within Arizona.

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34 *Id.* at p. 36.

35 *Id.* at pp. 2-5.

36 *Id.* at p.2.

Specifically, U S WEST provides interconnection at any technically feasible point within the carrier's network, as established by the mechanisms of collocation, mid-span meet, entrance facility, and interLCA calling. The SGAT legally obligates U S WEST to rates, terms and conditions that are reasonable and nondiscriminatory. The performance measurements demonstrate that the interconnection provided is equal in quality to that which U S WEST provides to itself. Finally, the actual results of these efforts, as measured by the significant competitive activity, provide compelling validation that U S WEST satisfies Checklist Item One.

Checklist Item Eleven: Number Portability

Overview

Section 271 (c)(2)(B)(xi) of the 1996 Act requires U S WEST to comply with the number portability regulations the Commission has adopted pursuant to section 251 of the 1996 Act.[37] Section 251(b)(2) of the 1996 Act requires U S WEST "to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the Commission."[38] The 1996 Act defines number portability as "the ability of users of telecommunications services to retain, at the same location, existing telecommunications numbers without impairment of quality, reliability, or convenience when switching from one telecommunications carrier to another,"[39] which the Commission has incorporated into its rules.[40]

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37 47 U.S.C. § 271(c)(2)(B)(xi).

38 47 U.S.C. § 251(b)(2).

39 47 U.S.C. § 153(30).

40 47 C.F.R. § 52.21(k). Section 251(e)(2), requires that "[t]he cost of establishing telecommunications numbering administration arrangements and number portability shall be borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission. *See generally: Second BellSouth Louisiana Order,* 13 FCC Rcd at 20757 (citing 47 U.S.C. § 251(e)(2) and *In the Matter of Telephone Number Portability,* Third Report and Order, 13 FCC Rcd 11701, 11702-11704, para. 4 & nn.4, 7, 9, 12 (1998) (*Third Number Portability Order*)). *See also In the Matter of Telephone Number Portability,* Fourth Memorandum Opinion and Order on Reconsideration, CC Docket No. 95-116, RM 8535 at paras. 1, 6-9 (June 23, 1999)(*Fourth Number Portability Order*).

These statutory provisions required incumbent local exchange carriers to offer interim number portability "to the extent technically feasible,"[41] gradually replacing it with permanent number portability.[42] The Commission established guidelines for states to follow in mandating a competitively neutral cost-recovery mechanism for interim number portability,[43] and created a competitively neutral cost-recovery mechanism for long-term number portability.[44]

U S WEST legally obligates itself to fulfilling these provisions through numerous interconnection agreements approved by the Arizona Commission, and through its Statement of Generally Acceptable Terms (SGAT – a revised version of which was filed with the Commission on April 7, 2000), as well as the bona fide request (BFR) process. U S WEST has implemented the terms of the SGAT through a series of processes described herein. Over 98 percent of its access lines have been converted to LNP with 100 percent planned by October 2, 2000.[45] U S WEST has continued to evolve and improve its LNP provisioning and repair processes, including the offering of out-of-hours provisioning of LNP.

Moreover, U S WEST is currently implementing the new performance measures for number portability developed in the Arizona workshops; these are planned to be available during July 2000.[46] Number portability has clearly been a successful competitive tool in Arizona with 224,291 telephone numbers ported as of the end of April 2000.

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41 Fourth Number Portability Order at para. 10 (citing In re Telephone Number Portability, First Report and Order and Further Notice of Proposed Rulemaking, 11 FCC Rcd 8352, 8409-12 (1996)(First Number Portability Order). See also 47 U.S.C. § 251(b)(2).

42 *See* 47 C.F.R. §§52.23(b)-(f); *Second BellSouth Louisiana Order,* 13 FCC Rcd at 20758; *First Number Portability Order,* 11 FCC Rcd at 8355-56, 8399-8404; *Third Number Portability Order,* 13 FCC Rcd at 11708-12.

43 *See* 47 C.F.R. § 52.29; *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20758; First Number Portability Order, 11 FCC Rcd at 8417-24.

44 *See* 47 C.F.R. § 52.32-52.33; *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20578; *Third Number Portability Order*, 13 FCC Rcd at 11706-07; *Fourth Number Portability Order* at para. 9*; see generally Fourth Number Portability Order.*

45 Supplemental Affidavit of Margaret S. Bumgarner, p. 2.

46 *Id.* at p.5.

LNP Processes

U S WEST's LNP process team meets weekly to continue to improve the provisioning and repair processes for LNP.[47] U S WEST provides timely updates of the documentation of procedures to CLECs for ordering, provisioning, maintenance and repair of number portability arrangements. The documentation of U S WEST's LNP methods and procedures is sent directly to the CLECs and is included in the Interconnect and Resale Resource Guide which is available on U S WEST's website.[48]

One of the more significant improvements to U S WEST's LNP process has been the offering of out-of-hours provisioning. At the request of several CLECs, U S WEST began out-of-hours LNP provisioning on Saturdays on a trial basis in August 1999, which was then expanded to include out-of-hours provisioning twenty-four hours a day, seven days a week in November 1999.[49]

Over the last year, U S WEST also has considerably improved switch and system development, as well as processes to mechanize and increase the pre-setting of Line Side Attribute (LSA) – or 10-digit unconditional – triggers, in its switches.[50] When the LSA trigger is set on a telephone number prior to the Frame Due Time or prior to the start time of an unbundled loop cutover, the CLEC controls the activation of number portability.[51]

Performance Indicators

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47 *Id.* at p.3.

48 Interconnect and Resale Resource Guide website: http://www.uswest.com/carrier.

49 Supplemental Affidavit of Margaret S. Bumgarner, p. 3-4.

50 *Id.* at p. 4. This process allows the CLEC to control the activation of number portability on the due date. The translation in the switch of a Line Side Attribute (LSA), referred to as "setting a trigger", is an Advanced Intelligent Network (AIN) feature that causes call termination within the original "donor" switch to a specific line's telephone number to be suspended and a query is sent to the LNP database for routing information. If the telephone number in the LNP database shows that the number has not been ported yet, the call is terminated in the original switch as usual. If the telephone number in the LNP database shows that porting has been activated by the CLEC, the new routing information is returned and the call is routed to the CLEC's switch for call termination.

51 Supplemental Affidavit of Margaret S. Bumgarner, p. 5.

The new performance indicators for LNP developed in the Arizona workshops – OP-8B and OP-8, set forth in Exhibit MSB-15 – are currently being implemented by U S WEST, with a planned availability of July 2000. They are briefly described below:

1. OP-8B Coordinated Local Number Portability (LNP) Timeliness (percent). This performance indicator measures the percentage of LSA triggers, also referred to as LNP triggers, that are translated ("set") in the switch prior to the scheduled start time for the unbundled loop cutovers. The unbundled loop cutovers require coordination between U S WEST and the CLEC. If the LSA trigger is set prior to the start of the cutover, the CLEC controls the activation of number portability without the need for any involvement by or coordination with U S WEST.

2. OP-8C Non-Coordinated LNP Triggers Set on Time (percent). This performance indicator measures the percentage of LSA triggers that are set prior to the Frame Due Time (FDT) for all LNP orders for which coordination is not required. The FDT is established by the CLEC on their service order. If the LSA trigger is set prior to the FDT, the CLEC controls the activation of number portability without the need for any involvement by or coordination with U S WEST.

LNP Deployment

The best measure of competitive access, however, is the actual experience in the marketplace. U S WEST completed its initial deployment of long-term number portability in the Phoenix MSA on August 3, 1998, and the Tucson MSA on November 2, 1998.[52] Since that time, U S WEST has deployed LNP based on bona fide requests received from CLECs as provided by FCC rules. Most significantly, U S WEST has completed LNP deployment in 161 switches in Arizona, covering over 98 percent of U S WEST's access lines in the state.[53]

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52 Supplemental Affidavit of Margaret S. Bumgarner, p. 2.

53 U S WEST only has six more switches to convert to LNP in Arizona. The Pima and Safford switches will be converted to LNP on July 3, 2000. The Benson, Saint David, Munds Park, and Page switches will convert to LNP on October 2, 2000, making LNP available to 100% of U S WEST's access lines in Arizona. The LNP deployment

As of April 30, 2000, U S WEST has ported 224,291 telephone numbers in Arizona and 832,563-telephone numbers region-wide. In Arizona alone, there were over 15 thousand telephone numbers ported in January and over 24 thousand telephone numbers ported during the month of February 2000.[54] Due to the comprehensive deployment of LNP in Arizona, there has been no interim number portability (INP) activity for over a year in the state.

Summary and Conclusion

U S WEST has legally obligated itself to provide long-term number portability (LNP) through the concrete terms of numerous Interconnection agreements approved in Arizona as well as the SGAT. U S WEST has documented processes and procedures for implementation of number portability and has continued to evolve those processes to improve the provisioning of number portability, including the availability of out-of-hours provisioning.

The performance indicators developed in the Arizona workshops will ensure that U S WEST continues to meet its obligations. Most tellingly, U S WEST has successfully completed deployment of LNP, according to the Act and the FCC's rules and schedule, with LNP currently available to over 98 percent of U S WEST's access lines in Arizona. As of April 30, 2000, U S WEST has ported 224,291 telephone numbers in Arizona and 832,563-telephone numbers region-wide. All of these factors demonstrate conclusively that U S WEST provides number portability in Arizona that satisfies the requirements of the Act and the FCC.

Checklist Item Fourteen: Resale

Overview

Section 271(c)(2)(B)(xiv) of the Act requires U S WEST to make "telecommunications services . . . available for resale in accordance with the requirements of sections 251(c)(4) and

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schedule is available on U S WEST's Network Disclosure website for scheduled LNP conversions (www.uswest.com/com/disclosures/netdisclosure414/indexcontent.html) and is included in the national Local Exchange Routing Guide. Exhibit MSB-13 is the LNP deployment schedule for all of U S WEST's switches in Arizona.

[54] *See generally,* Supplemental Affidavit of Margaret S. Bumgarner, p. 3. Exhibit MSB-14 shows the numbers have been ported monthly using INP and LNP in Arizona.

252(d)(3)."[55] As an ILEC, Section 251(c)(4)(A) requires U S WEST "to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carriers." [56]

The Resale Process

U S WEST meets this obligation by providing all retail telecommunications services for resale through the interconnection and resale agreements approved by the Commission, as well as the nondiscriminatory terms and conditions of the SGAT. Specifically, Section 6 of the SGAT concerns resale and demonstrates U S WEST's legally binding obligation in this regard; specifically:

> 6.1.1 U S WEST shall offer for resale at wholesale rates any Telecommunications Service that it provides to subscribers who are not Telecommunication Carriers, subject to the terms and conditions of this Section. All U S WEST retail telecommunications services are available for resale from U S WEST pursuant to the Act and will include terms and conditions (except prices) in U S WEST's applicable product Tariffs.[57]

In order to establish that the terms and conditions are nondiscriminatory, U S WEST has developed processes for preordering and ordering for CLECs that are the same as those for U S WEST's retail operations.[58] Similarly, the processes for installation and repair are the same, whether resold by CLECs or sold by U S WEST's retail operation. A service order is handled exactly the same way, by exactly the same personnel, and by the same systems, whether it is an order from a CLEC or from U S WEST.[59] Finally, in order to promote effective opportunities for

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55 47 U.S.C. § 271(c)(2)(B)(xiv).

56 Section 252(d)(3) sets forth the basis for determining "wholesale rates" as the "retail rates charged to subscribers for the telecommunications service requested, excluding the portion thereof attributable to any marketing, billing, collection, and other costs that will be avoided by the local exchange carrier." 47 U.S.C. § 252(d)(3).

57 Additional details concerning the scope and specifics of the SGAT concerning resale are set forth generally in the Affidavit of Lori A. Simpson, pp. 38-41.

58 *See generally* Affidavit of Lori A. Simpson, pp. 43-44, and the flow chart contained in Exhibits LAS 2 and LAS 3; Supplemental Affidavit of Lori A. Simpson, pp. 3-4.

59 Simpson Affidavit at 44; Simpson Supplemental Affidavit at 3-4.

CLECs wishing to resell U S WEST services, U S WEST has developed extensive training and customer support mechanisms.[60]

Performance Measures to Ensure Compliance

To demonstrate compliance with its commitments to CLECs, U S WEST has developed a number of performance measurements for resale. These measurements were developed, reviewed, and approved as part of Arizona's independent third-party evaluation of U S WEST's operational support system (OSS).[61]

More specifically, Arizona has applied a "parity" standard for each of these resale performance measurements consistent with the holdings of the FCC:

> [F]or those functions the BOC provides to competing carriers that are analogous to the functions a BOC provides to itself in connection with its own retail service offerings [i.e., resale], the BOC must provide access to competing carriers in "substantially the same time and manner" as it provides to itself. Thus, where a retail analogue exists, a BOC must provide access that is equal to (i.e., substantially the same as) the level of access that the BOC provides itself, its customers, or its affiliates, in terms of quality, accuracy and timeliness.[62]

In analyzing Bell Atlantic New York's performance measures, the FCC held that "to the extent there is no statistically significant difference between Bell Atlantic's provision of service to competitive LECs and its own retail customers, we [the FCC] need not look any further."[63] Accordingly, after the resale workshop is complete, if U S WEST's performance data establishes that its provision of resale services is statistically equivalent to its own retail performance, these results would provide conclusive evidence of nondiscriminatory access to resale, and the Commission will need to analyze only that data, if any, where a statistically significant difference exists.

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60 For a detailed comprehensive discussion of the training structure and systems that U S WEST provides to CLECs, *see generally:* Simpson Affidavit at 44-47; Simpson Supplemental Affidavit at 5-8.

61 *See generally* Supplemental Affidavit of Lori A. Simpson, Exhibits LAS 6 (which describes the measures relating to retail), and LAS 7 (which describes resale test scenarios that are part of the OSS test).

62 Bell Atlantic New York Order at ¶ 44.

63 *Id.* at ¶ 58.

Performance Measurements Demonstrate Equal and Nondiscriminatory Resale Access

The performance data developed thus far demonstrates that on the whole, U S WEST convincingly meets the test for equal and nondiscriminatory access.[64] Attached to the Supplemental Affidavit of Lori A. Simpson as Exhibit LAS-4 are performance results for January 2000 through April 2000. The measurements used to prepare these results are the measurements that have been agreed to in the Arizona Third Party Operational Support System (OSS) Test and Workshops as of the time of this filing.[65]

Specifically, U S WEST currently provides 11 performance measurements for resale. These measurements are listed in the table below.

U S WEST Performance Indicators for Checklist Item 14 – Resale

	Indicator Number	***Checklist Item 14 Performance Indicator***
1	OP-3	Installation Commitments Met
2	OP-4	Installation Interval
3	OP-5	New Service Installation Without Trouble Reports for 30 Days After Installation (replaces OP-14 as of 1-1-2000)
4	OP-6	Delayed Days
	OP-14	Installation Reports within 30 Days of Installation (replaced with OP-5 as of 1-1-2000)
5	MR-3	Out of Service Cleared within 24 Hours (nondesigned repair process)
6	MR-4	All Troubles Cleared within 48 Hours (nondesigned repair process)
7	MR-5	Out of Service Cleared within 4 Hours (designed repair process)
8	MR-6	Mean Time to Restore
9	MR-7	Repair Repeat Report Rate
10	MR-8	Trouble Rate

64 The initial Performance Indicator Definitions (PIDs) for Arizona for checklist item 14, Resale, for the period of July, 1998, through January, 1999,were discussed in the previously filed testimony of Mr. Mike Williams. Since that time, parties to this docket have spent a substantial amount of time writing and revising the PIDs, the results of which are discussed in detail in the Affidavit of Lori A. Simpson.

65 Once the Technical Advisory Group (TAG) concludes that its work with respect to PIDs is complete, U S WEST will revise its SGAT to incorporate the final performance measurements. It should be noted that Arizona SGAT, Section 20, as revised on 4-7-2000, includes an incorrect reference to development of performance measurements as part of the "Regional Oversight Committee" process; U S WEST is filing a correction to the SGAT to refer to development of performance measurements as part of the "Arizona Third Party OSS Test and Workshops."

11	MR-9	Repair Appointments Met

Resale performance results are reported in two categories for each of the measurements listed: (1) the category of services provided to, or resold by, CLECs; and, (2) the category of the same services provided by U S WEST to its retail end users. Performance results are further disaggregated into categories such as the type of service provided or maintained under each measurement listed above, for CLECs and for U S WEST retail. The Supplemental Affidavit of Lori A. Simpson contains a measurement-by-measurement analysis of the performance results attached in Exhibit LAS-4 to her Affidavit; these results will be summarized here.

By way of brief overview, the aggregate results demonstrate that U S WEST is providing resale to CLECs on an equal and nondiscriminatory basis. While there are some subcomponents of the data that will require further investigation and analysis, on the whole, CLECs experience equal, and frequently significantly better, performance than that which U S WEST provides its own retail customers.

Results for installation of services resold by CLECs

1. **Installation Commitments Met** (OP-3), measures the percentage of orders for which U S WEST meets the scheduled due date. For resold services, U S WEST reports "Installation Commitments Met" performance results for resale and for U S WEST retail for 11 services, in the categories noted below:

a) Residence, Business, Centrex, Centrex 21, PBX, Basic ISDN, and ADSL,
- service requiring dispatch within MSAs
-service requiring dispatch outside MSAs
-service with no dispatch

b) Primary ISDN, DS0, DS1, and DS3
-high density
-low density

The performance results summarized in Exhibit LAS-4 demonstrate that U S WEST consistently meets due dates for CLECs at rates that are nondiscriminatory as compared to U S

WEST's retail results for the following services: Centrex, Centrex 21, ADSL, Basic ISDN, Primary ISDN, DS0, DS1, and DS3, and thus that U S WEST is meeting its resale obligations as to these services.

The overall results demonstrate that U S WEST consistently meets due dates for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results for a significant portion of all services measured here[66]. Under the FCC's BA-NY standard, given these results, there is no need to investigate further such services further, since U S WEST is conclusively meeting its resale obligations as to them.

2. **Installation Interval** (OP-4), measures the average interval, in business days, between the application date and the completion date for service orders.[67] The performance results demonstrate that U S WEST provides nondiscriminatory installation intervals to CLECs for each of these services. In fact, the results for every service, in every category, for every month reported, indicate better service was provided to CLECs than to U S WEST retail, with two exceptions, Business and Centrex 21 services, both of which still show parity in installation intervals.

3. **New Service Installation Without Trouble Reports** (OP-5), measures the monthly average percentage of new installations that are free of trouble reports for the first thirty days.[68] For resold services, U S WEST reports performance results for "New Service Installation Without Trouble Reports" for eight different services, as follows: Residence, Business, Centrex,

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66 Supplemental Affidavit of Lori A. Simpson, p. 11-12. As noted in the Affidavit, the only resale data that falls below retail parity for OP-3 is installation commitments met for CLECs' resold Residence service for orders requiring dispatch within MSAs and for orders not requiring dispatch, and for Business service for orders not requiring dispatch. It should be noted, however, that installation Intervals (OP-4) indicates that the average installation interval for resold Residence and Business services, with and without dispatch, are significantly better for CLECs than for U S WEST retail for nearly every month reported. Thus, this data substantially mitigates against any finding that U S WEST discriminates in the provision of this service measures the percentage of orders for which U S WEST meets the scheduled due date.

67 For resold services, U S WEST reports "Installation Interval" data for the same 11 services and categories identified for OP-3 above.

68 This measurement replaced the measurement "Installation Reports Within 30 Days," (OP-14), effective January, 2000.

PBX, Primary ISDN, DS0, DS1, and DS3. The performance results for these measurements indicate that U S WEST provides nondiscriminatory installation for each of these services.[69]

4. **Delayed Days** (OP-6), measures the average number of business days service is delayed beyond the original due date, where such delay is attributable to U S WEST for facility and nonfacility reasons. For resold services, U S WEST reports "Delayed Days" data for 11 services under two to three different categories, as follows:

a) Residence, Business, Centrex, Centrex 21, PBX, Basic ISDN, and ADSL,
   -service requiring dispatch within MSAs
   -service requiring dispatch outside MSAs
   -service with no dispatch

b) Primary ISDN, DS0, DS1, and DS3
   -high density
   -low density

The "Delayed Days" performance results demonstrate that U S WEST provides nondiscriminatory installation intervals to CLECs for each of the services noted, in each category. In fact, in the categories of Residence dispatched within MSAs for nonfacility reasons, and for Residence nondispatched for nonfacility reasons, for all months reported, CLECs were delayed fewer days than U S WEST retail customers.[70]

1. **Out-of-Service Cleared within 24 Hours** (MR-3), measures the percentage of out-of service trouble reports cleared within 24 hours of receipt of a call or electronic repair report from a CLEC by U S WEST. For resold services, U S WEST reports "Out-of-Service Cleared within 24 Hours" for five services as follows:

a) Residence, Business, Centrex, Centrex 21, and PBX
   -service requiring dispatch within MSAs

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69 Affidavit of Lori A. Simpson at 13.

70 *Id.* at pp. 14-15.

-service requiring dispatch outside MSAs

-service with no dispatch

The results reported in Exhibit LAS-4 do not indicate any negative trends in performance results for CLECs. The performance results for this measurement show that U S WEST is providing nondiscriminatory repair for CLECs.[71]

2. **All Troubles Cleared within 48 Hours** (MR-4), measures the percentage of trouble reports on non-designed services that are cleared within 48 hours. For resold services, U S WEST reports "All Troubles Cleared within 48 Hours" for the same five services and the same three categories as identified for MR-3 above. No results reported in Exhibit LAS-4 indicate a negative trend in performance for CLECs. The overall results demonstrate that U S WEST consistently clears trouble for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results.[72]

3. **All Troubles Cleared within Four Hours** (MR-5), measures the percentage of trouble reports on designed services that are cleared within four hours of receipt of a call from a CLEC by U S WEST. For resold services, U S WEST reports "All Troubles Cleared within Four Hours" for DS0, DS1, and DS3 in High density and Low-density categories. The performance results indicate that U S WEST is providing nondiscriminatory repair service to CLECs in this category.[73]

4. **Mean Time to Restore** (MR-6), measures the average time to resolve repair requests. For resold services, U S WEST reports "Mean Time to Restore" for eight services in the categories noted:

a) Residence, Business, Centrex, Centrex 21, and PBX

-service requiring dispatch within MSAs

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71 *Id.* at 15.

72 *Id.* at pp.15-16.

73 *Id.* at p. 16.

-service requiring dispatch outside MSAs

-service with no dispatch

b) DS0, DS1, and DS3

-High density

-Low density

The performance results indicate that U S WEST is providing nondiscriminatory repair service to CLECs in this category.[74]

5. **Repair Repeat Report Rate** (MR-7), measures the percentage of repair reports that are repeated within 30 days. For resold services, U S WEST reports "Repair Repeat Report Rate" for the same eight services and the same categories identified for MR-6 above. The performance results indicate that U S WEST is repairing trouble effectively and in a nondiscriminatory manner.[75]

6. **Trouble Rate** (MR-8), measures trouble reports by service and compares them to the number of lines in service. For resold services: U S WEST reports "Trouble Rate" for four services, specifically: Residence; Business; Centrex; and, PBX.

While the performance results demonstrate that U S WEST is providing nondiscriminatory repair and maintenance service to CLECs for Business and PBX services, the trouble rate related to Residence and Centrex services appear to require further analysis.[76] Accordingly, U S WEST is investigating these results and will determine whether there is a reasonable explanation or whether an action plan to resolve the difference is needed.

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74 *Id.* at 17

75 *Id.*

76 Specifically, the performance results for Residence service trouble rates for U S WEST retail, as compared to resale, show statistically significant differences in three of the four months reported; and, for Centrex service trouble rates, statistically significant differences appear for all four months reported. *Id.* at 18-19.

7. **Repair Appointments Met** (MR-9) measures the percentage of repair reports for which the appointment date and time is met.[77] For resold services, U S WEST reports "Repair Appointments Met" for five different services in the categories noted:

a) Residence, Business, Centrex, Centrex 21, and PBX

-service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

While the overall performance results for this measurement generally indicate that U S WEST provides nondiscriminatory service to CLECs as compared to U S WEST retail, the results for certain categories for three services, Business, Centrex, and Centrex 21, appear to require further analysis.[78] Accordingly, U S WEST is investigating these results and will determine whether there is a reasonable explanation or whether an action plan to resolve the difference is needed.

The Results of U S WEST's Resale Efforts Provide Compelling Evidence of Competition

CLECs have resold, and U S WEST currently provides, more than 21,300 local exchange lines and numerous other services to 33 reseller CLECs in Arizona. This includes more than 16,600 residential lines and 4,700 business lines.[79] Clearly, these results indicate significant compliance with Checklist Item Fourteen.

Summary

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[77] *Id.* at 19.

[78] Specifically, for Business service repair requests requiring dispatch within MSAs, and for Business service repair requests requiring dispatch outside of MSAs, the data for three of the four months reported indicate a statistically significant difference in performance for U S WEST retail as compared to resale. Further, for Centrex repair requests not requiring dispatch, the data show a statistically significant difference in performance for three of the four months reported, and for Centrex 21, for nondispatched repair requests the data show a statistically significant difference for three of the four months reports, and for Centrex 21 repair requests requiring dispatch within MSAs, the data show statistically significant differences in performance for all of the four months reports. *Id.* at 19.

[79] Supplemental Affidavit of Lori A. Simpson, p. 2.

U S WEST meets Checklist Item Fourteen by providing resale services through the legally binding mechanisms of the proposed SGAT as well as Commission-approved interconnection and resale agreements. In order to assure that these services are provided on an equal basis, the procedures for preordering, ordering, installation and repair for CLECs are the same as those that U S WEST provides for its own retail operations, and detailed performance measurements will ensure that the services are of the same kind and quality.

Conclusion

U S WEST has established concrete and legally binding commitments to meet the requirements of Checklist Items One, Eleven and Fourteen. These obligations are set forth in the SGAT and implemented though procedures designed to provide equal and nondiscriminatory access, and measured by performance indicators to ensure that these commitments are met. In addition to complying with all of the established standards, the significant level of actual interconnection and resale activity in Arizona demonstrates convincingly that U S WEST meets the requirements of Checklist Items One and Fourteen.

Respectfully submitted,

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APPENDIX ONE

SGAT PROVISIONS TO BE ADDRESSED THIS WORKSHOP

U S WEST has agreed to provide all parties to this docket with a list of the SGAT provisions it intends to rely upon and discuss during the course of each workshop. During workshop number two on checklist items 1 and 14, U S WEST will rely upon the following SGAT provisions:

Checklist Item 1, Interconnection: SGAT Section 7 (less 7.3 which concerns reciprocal compensation)

Checklist Item 1, Collocation: SGAT Section 8

Checklist Item 1, Interconnection and Collocation: SGAT Section 17, which concerns the Bona Fide Request (BFR) Process

Checklist Item 14, Resale: SGAT Section 6

General: Any and all additional SGAT Sections referred to or mentioned anywhere within SGAT Sections 6, 7, 8 and 17.

General: All terms from SGAT Sections 6, 7, 8, and 17 as defined in SGAT Section 4.

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER

IN THE MATTER OF U S WEST COMMUNICATIONS, INC'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	DOCKET NO. T-00000B-97-0238

SUPPLEMENTAL AFFIDAVIT OF

LORI A. SIMPSON

U S WEST COMMUNICATIONS

JUNE 30, 2000

AFFIDAVIT INDEX

Page

I. Purpose of Supplemental Affidavit .....

II. Executive Summary.....

III. Updated Resale Volumes in Arizona.....

IV. Update on Services Available for Resale by CLECs.....

V. Additional Detail on U S WEST's Processes for Implementing Resale.....

VI. Update on U S WEST's Training and Support of CLECs Reselling U S WEST's Services.....

VII. Resale Performance Results - Nondiscriminatory Access to Services for Resale.....

VII.A Performance Results for Installation of Services Resold by CLECs .....

VII.B Performance Results for Repair of Services Resold by CLECs.....

VII.C Summary of Performance Results Analysis.....

VIII. Conclusion .....

I. Purpose of Supplemental Affidavit

The purpose of my supplemental affidavit is to provide updated testimony, information and performance results regarding checklist item 14, resale.

Specifically, my supplemental affidavit provides updated information concerning products and services available for resale by Competitive Local Exchange Carriers (CLECs) in Arizona under U S WEST's revised Arizona Statement of Generally Available Terms and Conditions for Interconnection and Resale (SGAT). Although U S WEST submitted a revised SGAT to the Commission on April 7, 2000, the resale provisions remained virtually identical. Therefore, my original affidavit described U S WEST's legal obligation to provide resold services to CLECs upon request. In addition, this supplemental testimony provides updated volumes of services provided for resale, a more comprehensive description of the processes U S WEST has implemented to ensure CLECs obtain resold services in substantially the same time and manner as U S WEST's retail end users, and recent performance results for resale (see Exhibit LAS-4).

II. Executive Summary

My initial affidavit establishes that U S WEST has satisfied the requirements of the Telecommunications Act of 1996 (Telecom Act) and FCC orders for providing retail telecommunications services for resale, which are prerequisites for U S WEST's entry into the interLATA long distance market in Arizona. U S WEST meets these requirements in Arizona through its SGAT and Commission-approved interconnection and resale agreements, which fulfill U S WEST's obligation to provide retail telecommunications services for resale under concrete and specific legally binding

terms and conditions that comport with the requirements of the Telecommunications Act of 1996 and FCC orders.

This supplemental affidavit provides additional evidence of U S WEST's compliance with the Telecom Act and FCC orders regarding services available for resale, the processes U S WEST has implemented to ensure nondiscrimination, the most current U S WEST performance indicators (PIDs) (see Exhibit LAS-5) that relate to resale, and U S WEST's most current performance results flowing from those PIDs.

III. Updated Resale Volumes in Arizona

Since I filed my initial affidavit in this matter, CLECs have resold additional volumes of services in Arizona. Specifically, CLECs have resold, and U S WEST currently provides, more than 21,300 local exchange lines and numerous other services to 33 reseller CLECs in Arizona. This includes more than 16,600 residential lines and 4,700 business lines.

U S WEST currently satisfies, and will continue to satisfy, the demand for services for resale, and is prepared to meet reasonably foreseeable future demand for resold services.

IV. Update on Services Available for Resale by CLECs

U S WEST has revised its policy concerning resale of Megabit services, pursuant to rules adopted by the FCC in FCC Docket 98-147. Megabit services are now available for resale from U S WEST at a discount. The revised Arizona SGAT provides as follows:

6.2.2.11 Megabit Services available to end-users are available for resale out of U S WEST's interstate tariff at the discount rates set forth in Exhibit A.

In addition, U S WEST has modified its policy with regard to resale of promotional offerings lasting 90 days or less. Such short term promotions are now available for resale from U S WEST. The revised Arizona SGAT provides as follows:

6.2.2.1 Promotional offerings of ninety (90) days or less are available for resale. Such promotions are available for resale under the same terms and conditions that are available to retail end-users, with no wholesale discount.

V. Additional Detail on U S WEST's Processes for Implementing Resale

The FCC's previous 271 orders make plain that U S WEST must make resold services available to CLECs in "substantially the same time and manner" as they make them available to U S WEST's retail end users.[1] U S WEST has developed processes to help ensure that CLECs obtain such nondiscriminatory treatment. My initial Exhibits LAS-2 and LAS-3 described the process flows that U S WEST uses for preorder, order, and maintenance/repair of resold services.

As is demonstrated by the exhibits noted above, U S WEST's processes for resold services provide nondiscrimination by the very design of the processes themselves. Specifically, preordering and ordering processes for CLECs reselling U S WEST's retail telecommunications services are the same as the preordering and ordering processes for the same services for U S WEST's retail operations.

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1 Memorandum Opinion & Order, *Application of Bell Atlantic New York Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region InterLATA services in New York,* CC Docket No. 99-295, FCC 99-404, at ¶ 44 (rel. Dec. 22, 1999) ("*Bell Atlantic New York Order*").

CLECs and U S WEST retail representatives must complete the same preordering and ordering steps in order to submit a service request on behalf of an end user. Depending on what is being ordered, these steps may include address validation, service availability check, customer service record retrieval, facility availability check, telephone number assignment, and appointment scheduling. The same information is available from the same U S WEST systems to both the CLEC and the U S WEST retail representative.

Moreover, the processes for installation and repair are the same for identical services whether resold by CLECs and or sold by U S WEST's retail operation. When a service order enters U S WEST's service order processor, it is handled exactly the same way, by the same personnel, and by the same systems, whether it is a CLEC order or a U S WEST retail order. When released into the service order processor, each service order is assigned and routed depending on its type. Designed service orders are routed to the Design Services Center which creates the design; plain old telephone service (POTS) service orders are routed directly to those operations which complete any translations or provisioning work steps in the switch and inside or outside field work. After these steps are completed, the service orders (for designed and POTS services) are marked as completed on a nightly basis. U S WEST's operational support systems (OSSs) such as those supporting billing, customer service records, listings, and repair line records, are electronically updated.

Repair requests are also handled by the same processes whether they are CLEC requests or U S WEST retail requests. The same systems and the same technicians process and complete all repair requests.

Finally, the same installation and repair intervals apply whether the services are resold by CLECs to their end users, or sold by U S WEST retail operations to its end users.

VI. Update on U S WEST's Training and Support of CLECs Reselling U S WEST's Services

My original affidavit described training and support provided to CLECs that resell, or wish to resell, U S WEST's retail telecommunications services. This supplemental affidavit provides additional and updated information concerning such training and support.

First, U S WEST provides several types of training for CLECs both on an instructor-led basis, a web-based basis, and by providing training materials that CLECs may download from a U S WEST web site.

U S WEST has implemented a web site at http://www.uswest.com/wholesale/, which is the on-line source for current information on partnering with U S WEST for retail telecommunications services that ease market penetration and expansion for reseller CLECs. The following U S WEST training for CLECs is available via this web site, including the capability to register on-line for training.

-Instructor Led Training

-Interconnect Mediated Access/Graphical User Interface
-Listings

-Web Based Interactive Training

-Customer ASR and LSR Web Based Training

-Downloadable Training

-IMA Learning Guide – Class Companion
-IMA User's Guide, Release 5.0
-IMA System Administration Guide
-IMA Repair Guide
-Download Held, Escalated, & Expedited Tool (HEET) Job Aid

In addition to providing CLEC training and training materials, U S WEST provides extensive support for CLECs via on-line product and service materials and information, and other reference materials, including, but not limited to, those listed below. These materials and information are also available at the web site http://www.uswest.com/ wholesale/.

-Product and Service Information - This site Includes Product and Service Description, Strategy, Features/Benefits, Applications, Pricing, Implementation, U S WEST Contact Numbers, and Questions and Answers. The following reference materials are available on-line:

-How Resale is Offered
-Your Responsibilities as a Reseller
-Becoming a Reseller
-U S WEST Services for Resale

-Tariffs – on-line library of state and federal U S WEST tariffs

-Service Interval Guide for Resale & Interconnection Services

-Customer Services

Also available on-line is U S WEST's Interconnection and Resale Resource Guide. It contains the following information:

-Section 1. Business Procedures

-Section 2. Preordering Information

-Section 3. Product Information – Resale

-Section 4. Product Information – Interconnect

-Section 5. Manual Ordering Process/Forms

-Section 6. Training

The U S WEST web site for CLECs contains much more information and materials than are listed above; U S WEST provides extensive training, information, and reference materials to assist CLECs in doing business with U S WEST as resellers.

VII. Resale Performance Results - Nondiscriminatory Access to Services for Resale

As I noted in my initial affidavit filed in this matter, the Telecom Act requires U S WEST to provide CLECs services for resale on a nondiscriminatory basis, meaning in "substantially the same time and manner" as it provides like services to its retail end users.[2] To ensure its compliance with this requirement, and in order to monitor its performance in providing services for CLECs and U S WEST's retail operation, U S WEST worked with participants to this docket to develop a number of performance measurements for resale. U S WEST's resale measurements have been developed, reviewed and approved in the context of the Arizona third party operational support systems (OSS) test.

The Arizona third party test participants decided to use a "parity" standard for each of these resale performance measurements because the FCC requires U S WEST to provide CLECs with equivalent service to that it provides to its retail end users. As the FCC explained:

> [F]or those functions the BOC provides to competing carriers that are analogous to the functions a BOC provides to itself in connection with its own retail service offerings [i.e., resale], the BOC must provide access to competing carriers in "substantially the same time and manner" as it

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2 27 U. S. C. § 271(c)(2)(B)(xiv).

> provides to itself. Thus, where a retail analogue exists, a BOC must provide access that is equal to (i.e., substantially the same as) the level of access that the BOC provides itself, its customers, or its affiliates, in terms of quality, accuracy and timeliness.[3]

Similar performance measurements were developed by Bell Atlantic New York (BA-NY) through its own collaborative process. When the FCC analyzed BA-NY's performance measures it held "to the extent there is no statistically significant difference between Bell Atlantic's provision of service to competitive LECs and its own retail customers, we [the FCC] need not look any further."[4] In other words, U S WEST's resale data must show performance results for CLECs that are statistically equivalent to U S WEST's performance results for its retail operations and if so, the Commission must find that U S WEST is providing nondiscriminatory access to resale. It is only when a "statistically significant difference" exists between U S WEST's resale performance and its retail performance that the Commission will have to examine the evidence further to make a determination whether the statutory nondiscrimination requirements are met.[5] Thus, after the resale workshop is complete, the Commission's only additional function should be to analyze the evidence explaining that data, if any, where a statistically significant difference exists.

Mr. Mike Williams provided performance results for checklist item 14, resale, for the period of July, 1998, through January, 1999, in his previously filed testimony in this matter. This data reported reflected U S WEST's original Performance Indicator Definitions (PIDs) (see Exhibit LAS-5). Since that time, parties to this docket have

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3 Bell Atlantic New York at ¶ 44.

4 Id. at ¶ 58.

5 Id. at ¶ 59.

spent a substantial amount of time writing and revising the PIDs. Attached to this supplemental resale affidavit as Exhibit LAS-4 are performance results for January, 2000, through April, 2000. The measurements used to prepare these results are the measurements that have been agreed to in the Arizona Third Party Operational Support System (OSS) Test and Workshops as of the time of this filing. Once the TAG concludes that its work with respect to PIDs is complete, U S WEST will revise its SGAT to incorporate the final performance measurements.[6]

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6 The Arizona SGAT, Section 20, as revised on 4-7-2000, includes an incorrect reference to development of performance measurements as part of the "Regional Oversight Committee" process; U S WEST is filing a correction to the SGAT to refer to development of performance measurements as part of the "Arizona Third Party OSS Test and Workshops."

Specifically, the parties to this docket agreed that U S WEST should track 11 different performance measurements for resale. These measurements concern either the installation/provisioning of resold services or the repair/maintenance of resold services. The agreed-upon measurements are listed in the table below.

U S WEST Performance Indicators for Checklist Item 14 – Resale

	Indicator Number	***Checklist Item 14 Performance Indicator***
1	OP-3	Installation Commitments Met
2	OP-4	Installation Interval
3	OP-5	New Service Installation Without Trouble Reports for 30 Days After Installation (replaces OP-14 as of 1-1-2000)
4	OP-6	Delayed Days
	OP-14	Installation Reports within 30 Days of Installation (replaced with OP-5 as of 1-1-2000)
5	MR-3	Out of Service Cleared within 24 Hours (nondesigned repair process)
6	MR-4	All Troubles Cleared within 48 Hours (nondesigned repair process)
7	MR-5	Out of Service Cleared within 4 Hours (designed repair process)
8	MR-6	Mean Time to Restore
9	MR-7	Repair Repeat Report Rate
10	MR-8	Trouble Rate
11	MR-9	Repair Appointments Met

Performance results under these measurements are disaggregated further into categories that allow U S WEST to track and report its performance for specific types of service provided under particular circumstances (e.g., Repair Appointments Met - Residence – Nondispatched). For each performance measurement categories, results are reported monthly for each category in which there was CLEC activity for both: (1) services provided to, or resold by, CLECs; and, (2) the same services provided by U S WEST to its retail end users. This allows a direct comparison between the service provided to CLECs and the service provided to U S WEST's retail end users thereby allowing U S WEST to establish that it is providing such service "at parity."

Following is a measurement-by-measurement summary and analysis of the performance results attached in Exhibit LAS-4.

VII.A Performance Results for Installation of Services Resold by CLECs

1. The measurement "**Installation Commitments Met**," (OP-3), measures the percentage of orders for which U S WEST meets the scheduled due date. For resold services, U S WEST reports "Installation Commitments Met" performance results for both resale and U S WEST retail end users, for 11 different services. These services are further broken down in two or three different categories, as follows:

a) Residence, Business, Centrex, Centrex 21, PBX, Basic ISDN, and ADSL

- service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

a Primary ISDN, DS0, DS1, and DS3

-high density

-low density

The performance results provided in Exhibit LAS-4 demonstrate that U S WEST consistently meets due dates for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results for the following services in the following categories:

- Centrex, Centrex 21, PBX, Basic ISDN, and ADSL:

  - service requiring dispatch within MSAs;

  -service requiring dispatch outside MSAs;

  -service with no dispatch;

-Residence:

  -service requiring dispatch outside MSAs;

- Business:

  - service requiring dispatch within MSAs;

  -service requiring dispatch outside MSAs; and

- Primary ISDN, DS0, DS1, and DS3:

  -high density;

  -low density.

According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations as to these services.

However, when performance results show a statistically significant difference between service provided to CLECs as compared to U S WEST's retail end users, and where the differing results recur over several consecutive months, U S WEST will investigate the performance results. Of the 29 different resale measurement categories

under OP-3, installation commitments met, only three have more than one month that falls below retail parity. These three measurement categories are (1) residence service requiring a dispatch within MSAs; (2) residential service not requiring a dispatch; and (3) business service not requiring a dispatch. Each of these three measurement categories will be discussed individually.

For residential service with a dispatch within an MSA, U S WEST met between 77 percent and 84 percent of its commitments for CLECs and between 82 percent and 88 percent of its commitments for itself. Although the differences between the percentages for commitments met for CLECs and U S WEST retail are small, they constitute a "statistically significant difference" in three of the four months reported. This statistical disparity requires a closer look at the data and what it means. Is U S WEST discriminating in the provision of resold residential service with a dispatch within MSAs? The answer is no. The data found in OP-4, average installation interval, shows that CLECs, on average, get residential service with a dispatch within MSAs between 2.4 days and 3.5 days **faster** for CLECs than for U S WEST's retail end users. It also shows that, when a delay beyond the due date occurs, the delay is generally shorter for CLECs. Finally, it shows that the trouble rate that both CLECs and U S WEST's end users experience on lines are statistically indistinguishable. Thus, when the data is viewed wholistically, it is clear that U S WEST provides nondiscriminatory access to resold residential service with a dispatch within MSAs.

The data for resold residential service without a dispatch shows similar results. For residential service without a dispatch, U S WEST met between 92 percent and 97.5 percent of its commitments for CLECs. Nonetheless, U S WEST met 99 percent of its commitments for itself; therefore, although the differences in percentages for

commitments met for CLECs compared to commitments for U S WEST retail are small, they constitute a "statistically significant difference" in all four months reported. Again, this statistical disparity requires a closer look at the data and what it means. Is U S WEST discriminating in the provision of resold residential service without a dispatch? Again, the answer is no. The data found in OP-4, average installation interval, shows that CLECs get resold residential service without a dispatch in between 1.9 days and 2.3 days. This is, on average, between 0.3 days and 1.2 days **faster** for CLECs than for U S WEST's own retail end users. It also shows that, when a delay beyond the due date occurs, delays for nonfacility reasons are virtually identical for both CLECs' and U S WEST's end users, and delays for facility reasons are substantially shorter for CLECs. Finally, it shows that the trouble rate that both CLECs' and U S WEST's end users experience on lines are statistically indistinguishable. Thus, again when the data is viewed wholistically, it is clear that U S WEST provides nondiscriminatory access to resold residential service without a dispatch.

The data for resold business service without a dispatch shows similar results. For business service without a dispatch, U S WEST met between 89 percent and 99 percent of its commitments for CLECs, and U S WEST met 98 percent to 99 percent of its commitments for itself. Although the differences in the percentages between the commitments to CLECs and U S WEST retail are small, they constitute a "statistically significant difference" in two of the four months reported. This statistical disparity requires a closer look at the data and what it means. Is U S WEST discriminating in the provision of resold business service without a dispatch? Again, the answer is no. The data found in OP-4, average installation interval, shows that CLECs obtain resold business service without a dispatch in virtually identical timeframes as U S WEST's own retail end users. It also shows that, when a delay beyond the due date occurs, delays

are virtually identical for both CLECs' and U S WEST's end users. Finally, it shows that the trouble rate that for all resold business lines, both CLECs' and U S WEST's end users have experienced no trouble, literally none, on resold business lines at any time in the last four months. Thus, again when the data is viewed wholistically, U S WEST is providing nondiscriminatory access to resold business service without a dispatch.

2. The measurement "**Installation Interval**," (OP-4), measures the average interval, in business days, between the application date and the completion date for service orders. For resold services, U S WEST reports "Installation Interval" data for the same 11 services and the same two to three categories identified for OP-3 above. The performance results demonstrate that U S WEST uniformly provides nondiscriminatory installation intervals to CLECs for each of these services. In fact, the results for each service, in every category, almost universally indicate faster average installation was provided to CLECs' end users than for U S WEST's own retail end users. According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting this aspect of checklist item 14.

3. The measurement "**New Service Installation Without Trouble Reports**," (OP-5), measures the monthly average percentage of new installations that are free of trouble reports within 30 calendar days of installation. This measurement replaced the measurement "Installation Reports Within 30 Days," (OP-14), and became effective January, 2000. For resold services, U S WEST reports performance results for "New Service Installation Without Trouble Reports" for eight different services: Residence, Business, Centrex, PBX, Primary ISDN, DS0, DS1, and DS3

The performance results for each of these service categories indicate that U S WEST uniformly provides nondiscriminatory installation of service that is free from

trouble for 30 days as compared with U S WEST retail for each of these services. According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its obligations on this aspect of checklist item 14.

4. The measurement "**Delayed Days**," (OP-6), measures the average number of business days that service is delayed beyond the original due date. This measurement is further broken down into two categories: 1) delays caused for facility reasons; and, 2) delays caused for nonfacility reasons. U S WEST reports "Delayed Days" performance results, for the two categories noted above, for 11 different resold services and U S WEST retail services. These results for each service are further broken down into in two or three different categories, as follows:

a) Residence, Business, Centrex, Centrex 21, PBX, Basic ISDN, and ADSL

-service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

a Primary ISDN, DS0, DS1, and DS3

-high density

-low density

The "Delayed Days" performance results demonstrate that U S WEST uniformly provides nondiscriminatory installation intervals to CLECs for each of the services

noted, in each category. In fact, in many instances, especially delays for facility reasons, CLECs' end users have shorter delays than do U S WEST's end users. According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations on this aspect of checklist item 14.

VII.B Performance Results for Repair of Services Resold by CLECs

1. The measurement "**Out-of-Service Cleared within 24 Hours**," (MR-3), measures the percentage of time that U S WEST clears an out-of service situation within 24 hours of receipt of notification. U S WEST reports "Out-of-Service Cleared within 24 Hours" performance for both resale and U S WEST retail end users, for five different services. These services are further broken down into three different categories, as follows:

a) Residence, Business, Centrex, Centrex 21, and PBX

-service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

The performance results provided in Exhibit LAS-4 demonstrate that U S WEST consistently clears out of service troubles within 24 hours for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results for the following services:

- Residence, Centrex, and PBX:

-service requiring dispatch within MSAs;

-service requiring dispatch outside MSAs;

-service with no dispatch; and

- Business, and Centrex 21:

-service requiring dispatch outside MSAs;

-service with no dispatch.

According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations as to these services.

However, when performance results show a statistically significant difference between service provided to CLECs as compared to U S WEST's retail end users, and where the differing results recur over several consecutive months, U S WEST will investigate the performance results. Of the 15 different resale measurement categories under MR-3, only two have more than one month that falls below retail parity. These two measurement categories are (1) business service with dispatch within MSAs; and (2) Centrex 21 service with dispatch within MSAs. Each of these two measurement categories will be discussed individually.

For business service with a dispatch within MSAs, U S WEST cleared between 43 percent and 77 percent of its out-of-services troubles within 24 hours for CLECs and between 40 percent and 73 percent for itself. Although the range of performance is very similar, they constitute a "statistically significant difference" in two of the four months reported; specifically, for January and April. This statistical disparity requires a closer look at the data and what it means. Is U S WEST discriminating in the repair of

out-of-service trouble for resold business service with a dispatch within MSAs? The answer is no. Again, to understand why, the data must be viewed as a whole. Almost uniformly, "across the board," U S WEST appeared to provide slightly better repair (although not always statistically significant) on this service for itself in January and April and better repair for CLECs in February and March. This is true for out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), and repair appointments met (MR-9). This is not surprising. When a trouble ticket requires a dispatch, the amount of time that ticket takes to be cleared is highly dependent on a number of factors including weather, distance, and the specific trouble experienced. Thus, it is not surprising that there is a disparity, sometimes a large disparity, between repair results. This redounds to the benefit of U S WEST in some instances. In other instances it redounds to the benefit of the CLECs. This conclusion is further supported by the fact that the problem occurs in isolated months and does not persist over time. Thus, again when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of out-of-service trouble for business service with a dispatch.

For Centrex 21 service with dispatch within MSAs, U S WEST cleared between 37 percent and 66 percent of its out-of-service trouble reports for CLECs within 24 hours and between 43 percent and 74 percent for itself. The data shows a "statistically significant difference" in two of the four months reported; specifically, for January and April. This statistical disparity requires a closer look at the data and what it means. When we consider all of the data and ask whether U S WEST is discriminating in the repair of out-of-service trouble for resold Centrex 21 service with a dispatch within MSAs, we believe the answer is no. The overall data for repair of Centrex 21 shows that U S WEST is repairing Centrex 21 on a nondiscriminatory basis. For example,

U S WEST cleared trouble within 48 hours (MR-4) on a nondiscriminatory basis, mean time to restore the service was provided in a nondiscriminatory fashion (MR-6), and CLECs experienced substantially less repeat trouble (MR-7) after the service was restored the first time. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of out-of-service trouble for Centrex 21 service with a dispatch.

2. The next measurement, "**All Troubles Cleared within 48 Hours**," (MR-4), measures the percentage of time that U S WEST clears all trouble reports, whether it be out-of-service or otherwise, on nondesigned services within 48 hours from notification. U S WEST reports "All Troubles Cleared within 48 Hours" performance results for both resale and U S WEST retail end users for the same five services and the same three categories as identified for MR-3 above.

The performance results provided in Exhibit LAS-4 demonstrate that U S WEST consistently clears trouble within 48 hours for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results for the following services:

- Residence, Centrex, Centrex 21, and PBX:

  -service requiring dispatch within MSAs;

  -service requiring dispatch outside MSAs;

  -service with no dispatch; and

- Business:

  -service requiring dispatch outside MSAs.

According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations as to these services.

However, when performance results show a statistically significant difference between service provided to CLECs as compared to U S WEST's retail end users, and where the differing results recur over several consecutive months, U S WEST will investigate the performance results. Of the 15 different resale measurement categories under MR-4, only two have more than one month that falls below retail parity. These two measurement categories are (1) business service with dispatch within MSAs; and (2) business service without a dispatch. Each of these two measurement categories will be discussed individually.

For business service with a dispatch within MSAs, U S WEST cleared between 68 percent and 92 percent of its trouble reports within 48 hours for CLECs and between 63 percent and 86 percent for itself. Although the range of performance is very similar, there is a "statistically significant difference" in two of the four months reported; specifically, for January and April. This statistical disparity requires a closer look at the data and what it means. When we consider all of the data for repair of trouble for business service with a dispatch, and ask whether U S WEST is discriminating in the repair of these trouble reports, the answer is no. U S WEST already explained its reasons above when responding to out of service situations (MR-3). Thus, again, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of troubles for business service with a dispatch.

For business service without a dispatch, U S WEST cleared between 92 percent and 97 percent of its troubles within 48 hours for both CLECs and for itself. Although

the percentages between the performance for CLECs and U S WEST retail are virtually identical, there constitutes a "statistically significant difference" in two of the four months reported. Again, this statistical disparity requires a closer look at the data to determine whether U S WEST is discriminating in the repair of trouble for resold business service without a dispatch. We believe the answer is no because the overall data for repair of business service without a dispatch shows that U S WEST is repairing business lines on a nondiscriminatory basis. For example, the mean time to restore service (MR-6) was provided in a nondiscriminatory fashion, CLECs experienced substantially less repeat trouble (MR-7) after the service was restored the first time, and repair appointments were met on a nondiscriminatory basis. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of troubles for business service without a dispatch.

3. The next measurement, "**All Troubles Cleared within Four Hours**," (MR-5), measures the percentage of time that U S WEST clears trouble reports on designed services within four hours of notification. U S WEST reports performance results for "All Troubles Cleared within Four Hours" for both resale and U S WEST retail end users for three services in two different categories:

a) DS0, DS1, and DS3

-High density

-Low density

The performance results for this measurement in each of the six measurement categories uniformly indicate that U S WEST is providing nondiscriminatory repair of

design services to CLECs. Again, given these results, the FCC's BA-NY standard states that there is no further need for comment or investigation.

4. The next measurement, "**Mean Time to Restore**," (MR-6), measures the average time U S WEST takes to resolve repair requests. U S WEST reports performance results for "Mean Time to Restore" for both resale and U S WEST retail end users for eight services in two or three different categories:

a) Residence, Business, Centrex, Centrex 21, and PBX

-service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

a) DS0, DS1, and DS3

-High density

-Low density

The performance results for all 21 measurement categories uniformly indicate that U S WEST is providing nondiscriminatory repair service to CLECs. Again, given these results, the FCC's BA-NY standard states that there is no further need for comment or investigation.

5. The next measurement, "**Repair Repeat Report Rate**," (MR-7), measures the percentage of repair reports that are reported again within 30 days of the first report. U S WEST reports performance results for "Repair Repeat Report Rate" for both resale

and U S WEST retail end users for the same eight services and the same two or three categories identified for MR-6 above. The performance results indicate that U S WEST is uniformly repairing trouble effectively and in a nondiscriminatory manner. Again, given these results, the FCC's BA-NY standard states that there is no further need for comment or investigation.

6. The next measurement, "**Trouble Rate**," (MR-8), measures the percentage of lines in service that experience trouble in any one month compared to the total number of lines in service. U S WEST reports performance results for "Trouble Rate" for both resale and U S WEST retail end users for four services:

a) Residence, Business, Centrex, and PBX

The performance results provided in Exhibit LAS-4 demonstrate that U S WEST consistently provides nondiscriminatory repair of business and PBX services for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results. According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations as to these services.

However, when performance results show a statistically significant difference between service provided to CLECs as compared to U S WEST's retail end users, and where the differing results recur over several consecutive months, U S WEST will investigate the performance results. The results for residential and Centrex service show performance for CLECs that falls below retail parity in some or all of the four months reported. Each of these two measurement categories will be discussed individually.

For residence service, the percentage of lines with trouble ranged between 3.28 percent and 5.66 percent for CLECs and between 3.11 percent and 4.78 percent for U S WEST retail. Although the range of performance is comparatively similar, it constitutes a "statistically significant difference" in three of the four months reported. This statistical disparity requires a closer look at the data and what it means. When the data for the category of out-of-service trouble reports for residence service is veiwed as a whole, it is clear that U S WEST is not discriminating in the repair of resold residence service. The data found in out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), repair repeat report rate (MR-7), and repair appointments met (MR-9) for dispatches within MSAs show that U S WEST's performance in clearing trouble for CLECs' resold residence service is **superior** for each measurement, in each month reported, to that provided for U S WEST's retail residence service. Furthermore, the data found in out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), repair repeat report rate (MR-7), and repair appointments met (MR-9) for dispatches outside MSAs, and for nondispatched trouble reports, show that U S WEST's performance in clearing trouble for CLECs' resold residence service compared to its performance in clearing trouble for U S WEST retail residence service, is either statistically indistinguishable, or superior, for CLECs. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of trouble for residence service.

For Centrex service, the percentage of lines with trouble ranged between 0.24 percent and 0.44 percent for CLECs and between 0.11 percent and 0.16 percent for U S WEST retail. Although these differences constitute a "statistically significant difference" in four of four months reported, this statistical disparity requires a closer

consideration of the data and what it means. These performance results show that CLECs are experiencing a rate of trouble on their resold Centrex lines that is less than one half of one percent. Despite the statistical significance of the difference in the results, U S WEST is clearly providing excellent and nondiscriminatory repair performance for CLECs' resold Centrex service.

7. The last measurement, "**Repair Appointments Met**," (MR-9), measures the percentage of time that U S WEST meets its repair appointments. U S WEST reports performance results for "Repair Appointments Met" for both resale and U S WEST retail end users for five different services in three different categories, as follows:

a Residence, Business, Centrex, Centrex 21, and PBX

-service requiring dispatch within MSAs

-service requiring dispatch outside MSAs

-service with no dispatch

The performance results provided in Exhibit LAS-4 demonstrate that U S WEST consistently provides access to repair commitments for CLECs at rates that are nondiscriminatory as compared to U S WEST's retail results for the following services:

- Residence, and PBX:

-service requiring dispatch within MSAs;

-service requiring dispatch outside MSAs;

-service with no dispatch;

- Business:

  -service with no dispatch;

  - Centrex:

    -service requiring dispatch within MSAs;

    -service requiring dispatch outside MSAs; and,

- Centrex 21:

  -service requiring dispatch outside MSAs.

According to the FCC's BA-NY standard, given these results, there is no need to investigate further. U S WEST is conclusively meeting its resale obligations as to these services.

However, when performance results show a statistically significant difference between service provided to CLECs as compared to U S WEST's retail end users, and where the differing results recur over several consecutive months, U S WEST will investigate the performance results. Of the 15 different resale measurement categories under MR-9, five have more than one month that falls below retail parity. These five measurement categories are business service requiring a dispatch in MSAs, business service requiring a dispatch outside of MSAs, Centrex service not requiring a dispatch, Centrex 21 service requiring a dispatch within MSAs, and Centrex 21 service not requiring a dispatch.

For business service with a dispatch within MSAs, U S WEST met between 63 percent and 85 percent of its repair appointments for CLECs and between 82 percent

and 88 percent for itself. Although these differences constitute a "statistically significant difference" in three of four months reported, this statistical disparity requires a closer consideration of the data and what it means. As U S WEST has already explained under MR-3 above, it believes the data show U S WEST provides nondiscriminatory performance when responding to out-of-service situations. Thus, again when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of troubles for business service with a dispatch.

For business service with a dispatch outside MSAs, the differences in performance results for repair appointments met for three of the four months reported constitute a "statistically significant difference;" this statistical disparity also requires a closer consideration of the data and what it means. The overall data for repair of business service with a dispatch outside of MSAs shows that U S WEST is repairing business lines on a nondiscriminatory basis. The data found in out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), and repair repeat report rate (MR-7), dispatches outside MSAs show that U S WEST's performance in clearing trouble for CLECs' resold business service with a dispatch outside of MSAs is least equivalent to, and in some cases superior to, the performance for U S WEST retail in each month reported. Thus, again when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of troubles for business service with a dispatch outside of MSAs.

For Centrex service not requiring a dispatch, the percentage of repair appointments met ranged between 79 percent and 89 percent for CLECs and between 89 percent and 96 percent for U S WEST retail. This range in performance constitutes a "statistically significant difference" in three of the four months reported; however, this

statistical disparity requires a closer look at the data and what it means. Again, to understand why, the data must be viewed wholistically. The data found in out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), and repair repeat report rate (MR-7) for nondispatched Centrex repair service show that U S WEST's overall performance for CLECs compared to U S WEST retail is statistically indistinguishable. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of trouble for nondispatched Centrex service.

For Centrex 21 service with a dispatch within MSAs, the differences in performance results for repair appointments met for the four months reported constitute a "statistically significant difference;" however, this statistical disparity also requires a closer consideration of the data and what it means. The overall data for repair of Centrex 21 service with a within MSAs shows that U S WEST is repairing Centrex 21 lines on a nondiscriminatory basis. The data found in repair measurements MR-3, trouble reports cleared within 24 hours, MR-4, trouble reports cleared within 48 hours, MR-6, mean time to restore, and MR-7, repair repeat report rate, show that U S WEST's overall performance for CLECs' is nondiscriminatory. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of trouble for Centrex 21 service without a dispatch within MSAs.

For Centrex 21 service not requiring a dispatch, the percentage of repair appointments met ranged between 73 percent and 93 percent for CLECs and between 95 percent and 97 percent for U S WEST retail. This range in performance constitutes a "statistically significant difference" in three of the four months reported; however, this statistical disparity requires a closer look at the data and what it means. The data

found in out-of-service trouble reports cleared within 24 hours (MR-3), trouble reports cleared within 48 hours (MR-4), mean time to restore (MR-6), and repair repeat report rate (MR-7) for nondispatched Centrex 21 repair service show that U S WEST's overall performance for CLECs compared to U S WEST retail is **statistically equivalent**. Thus, when the data is viewed as a whole, U S WEST is providing nondiscriminatory repair of trouble for nondispatched Centrex 21 service.

VII.C Summary of Performance Results Analysis

In summary, U S WEST has provided resale performance results in Exhibit LAS-4 that demonstrate that reseller CLECs receive, overall, nondiscriminatory access to U S WEST's services for resale. For those few performance results that indicate statistically significant differences in the performance for resold services as compared to the same services provided to U S WEST retail, U S WEST takes these indications seriously, and is diligently investigating these results. However, it is important to note that performance for both installation and repair of resold services shows that U S WEST's actual performance results, when taken as a whole, indicate that U S WEST provides nondiscriminatory resale services for CLECs.

VIII. Conclusion

My supplemental testimony provides additional evidence that U S WEST has satisfied the requirements of Checklist Item 14 of Section 271 of the Telecommunications Act of 1996, which concerns providing resale of retail telecommunications services. This affidavit contains additional information on U S WEST's contractual obligations, its processes, its performance indicators, and its actual performance in providing resold services to CLECs. Most notably, U S WEST's

performance data provides compelling evidence that U S WEST provides resold services to CLECs in substantially the same time and manner as it provides similar services to its retail end users.

Because U S WEST has satisfied the requirements of the Act, the Commission should find that U S WEST has satisfied the Act's requirements for nondiscriminatory access to retail telecommunications services for resale, Checklist Item Number 14.

10.4.2.23 Pursuant to Sec.222(a), (b), (c), (d), and (e) of the Telecommunications Act, U S WEST will provide subscriber lists information gathered in U S WEST's capacity as a provider of local exchange service on a timely and unbundled basis, under nondiscriminatory and reasonable rates, terms and conditions to CLEC upon request for the purpose of publishing directories in any format. Upon request by CLEC, U S WEST shall enter into negotiations, and written agreement as appropriate, with CLEC for CLEC's use of U S WEST subscriber lists for other purposes.

10.4.2.5 CLEC end user listings will be treated the same as U S WEST's end user listings. No prior authorization shall be required for U S WEST to sell, make available, or release CLEC's end user listings to directory assistance providers. Prior written authorization from CLEC, which authorization may be withheld, shall be required for U S WEST to sell, make available, or release CLEC end user listings to directory publishers or third parties other than directory assistance providers. Listings shall not be provided or sold in such a manner as to segregate end users by carrier. U S WEST will not charge for updating and maintaining its listings database. CLEC will not receive compensation from U S WEST for any sale of listings by U S WEST.

10.5.2.10 U S WEST will timely enter into its directory assistance database updates of CLEC's listings. U S WEST will implement quality assurance procedures such as random testing for listings accuracy. U S WEST to sell, make available, or release CLEC's end user listings to directory assistance providers. Prior written authorization from CLEC, which authorization may be withheld, shall be required for U S WEST to sell, make available, or release CLEC end user listings to directory publishers or third parties other than directory assistance providers. Listings shall not be provided or sold in such a manner as to segregate end users by carrier. U S WEST will not charge for updating and maintaining its listings database. CLEC will not receive compensation from U S WEST for any sale of listings by U S WEST.

10.6.2.2 U S WEST will obtain and timely enter into its database daily updates of DA List Information, will implement quality assurance procedures such as random testing for listing accuracy, and will identify itself to end users calling its DA service either by company name or operating company number so that end users have a means to identify with whom they are dealing.

10.6.2.3 CLEC shall not use DA List Information provided hereunder for any other purposes than the provision of directory assistance service in Colorado. Upon request by CLEC, U S WEST shall enter into negotiations with CLEC for CLEC's use of U S WEST end user DA List Information for other purposes, such as for the provision of directory assistance service outside of Colorado.

10.6.2.3 CLEC shall not use DA List Information provided hereunder for any other purposes than the provision of directory assistance service in Colorado. By way of example and not limitation, DA List Information supplied by CLEC shall not be used by CLEC for soliciting subscribers, telemarketing, creating or distributing marketing lists or other compilations of marketing information, or publishing any form of directory. U S WEST shall not use CLEC's directory assistance listings supplied to U S WEST under the terms of this SGAT for purposes of than providing directory assistance service or DA List Information.

EXHIBIT LAS-4

CONFIDENTIAL AND PROPRIETARY

(REDACTED VERSION)

PERFORMANCE INDICATOR DEFINITIONS - RESALE

Ordering and Provisioning

OP-3 – Installation Commitments Met

Purpose:
Evaluates the extent to which U S WEST installs services for Customers by the scheduled due date.

Description:
Measures the percentage of orders for which the scheduled due date is met.

- All inward orders (Change, New, and Transfer order types) assigned a due date by U S WEST and which are completed/closed during the reporting period are measured, subject to exclusions specified below. These include orders with customer-requested due dates longer than the standard interval.
- Completion date on or before original due date is counted as a met due date.

Reporting Period: One month	**Unit of Measure**: Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be reported according to orders involving: OP-3A Dispatches within MSAs; OP-3B Dispatches outside MSAs; and OP-3C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: OP-3D In High Density areas; and OP-3E In Low Density areas.

Formula:
[(Total Orders completed on Original Due Date) / (Total Orders Completed)] x 100

Explanation: The percent commitments met is obtained by dividing the total number of service orders completed on the original due date by the total number of service orders completed during the measurement period.

Exclusions:

- Disconnect, From (another form of disconnect) and Record order types.
- Due dates missed for standard categories of customer reasons. Standard categories of customer reasons are: previous service at the location did not have a customer-requested disconnect order issued, no access to customer premises, or customer requested a later due date when the technician arrived to do the work.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service

Megabit	Parity with retail service
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
Density-Type Disaggregation -	
• Resale	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (separately reported)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line
UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level
• Unbundled Loops:	
Analog Loop	TBD (pending conclusion of discussions among parties)
Non-loaded Loop (2-wire)	TBD (pending conclusion of discussions among parties)
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	TBD (pending conclusion of discussions among parties)
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate Private Line services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available: Performance results and statistical parameters (except as noted below) • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative – beginning with Jun 00 data on the Jul 00 report	**Notes:**

OP-4 – Installation Interval

Purpose:
Evaluates the timeliness of U S WEST's installation of services for customers, focusing on the average time to install service.

Description:
Measures the average interval (in business days) between the application date and the completion date for service orders accepted and implemented.

- All inward orders (Change, New, and Transfer order types) assigned a due date by U S WEST and which are completed/closed during the reporting period are measured, subject to exclusions specified below.
- Intervals for each measured event are counted in whole days: the application date is day zero (0); the day following the application date is day one (1).

Reporting Period: One month	**Unit of Measure**: Average Business Days

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be reported according to orders involving: OP-4A Dispatches within MSAs; OP-4B Dispatches outside MSAs; and OP-4C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: OP-4D In High Density areas; and OP-4E In Low Density areas.

Formula:
([(Order Completion Date) – (Order Application Date)] / Total Number of Orders Completed

Explanation: The average installation interval is derived by dividing the sum of installation intervals for all orders (in business days) by total number of service orders completed in the reporting period.

Exclusions:

- Orders with customer requested due dates greater than the current standard interval. (This exclusion does not apply to LIS trunks, for which orders for all requested intervals are included.)
- Orders with intervals lengthened due to customer-caused delays.
- Disconnect, From (another form of disconnect) and Record order types.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with retail service
Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
Density-Type Disaggregation -	
• Resale	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services	Parity with retail service

(aggregate)	
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks separately reported
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with DS1 Private Line Service
UDIT – Above DS1 level	Parity with Private Lines above DS1 level
• Unbundled Loops:	
Analog Loop	TBD (pending conclusion of discussions among parties)
Non-loaded Loop (2-wire)	TBD (pending conclusion of discussions among parties)
Non-loaded Loop (4-wire)	Parity with retail DS1Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	TBD (pending conclusion of discussions among parties)
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available: Performance results and statistical parameters (except as noted below) • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

OP-5 – New Service Installation Quality

Purpose:
Evaluates quality of ordering and installation of services, focusing on (A) the average monthly extent that new order installations were free of trouble reports for thirty (30) calendar days following installation and (B) The percentage of new service installations that experienced a trouble report during the period from the installation date to the date the order is posted complete.

Description:
OP-5A Measures the monthly average percentage of new installations that are free of trouble reports within 30 calendar days of initial installation.

- New installation orders used in calculating this performance indicator (appearing in the numerator and the denominator of the OP-5A formula shown below) are all inward orders for the current and previous reporting periods, including Change (C-type) orders for additional lines.
- All trouble reports (for both out-of-service and service-affecting conditions) closed within the reporting period, which were received within thirty (30) days of the original installation of service, are measured (for use in the numerator of the formula shown below), subject to exclusions shown below.

OP-5B Measures the monthly average percentage of trouble reports reported by the CLEC on or after the day the order is installed and prior to the completion of the order in U S WEST's service order processor.

- New installation orders used in calculating this performance indicator (appearing in the denominator of the OP-5B formula shown below) are all inward orders for the current reporting period (including change (C-type) orders for additional lines).
- Includes both out of service and service affecting trouble reports, subject to exclusions shown below.

Reporting Period: One month (for trouble reports); Average of prior and current reporting month (for new installation activity) in OP-5A); Current reporting month (for new installation activity in OP-5B)..	**Unit of Measure:** Percent of recently-completed orders

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for products/services listed under Product Reporting under "MSA-type Disaggregation" will be reported for OP-5A and OP-5B according to orders involving: 1 Dispatches within MSAs; 2 Dispatches outside MSAs; and 3 No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: 4 In High Density areas; and 5 In Low Density areas.

Formula:
OP-5A = [((Number of New Installation Orders completed in the [prior + current months]/2) - (Total Number of New Installation-related Trouble Reports received within 30 Calendar Days of Order Completion)) / (Number of New Installation Orders completed in the [prior + current months]/2)] x 100

OP-5B = [(Count of troubles reported by CLEC on or after the day of installation and prior to the order being posted as complete) / (Number of New Installation Orders completed in the current reporting period)] x 100

Exclusions:

- Trouble reports found to be related to customer equipment, customer education (instruction on how to use product or service), and inside wire.
- Subsequent trouble reports for the same trouble before it is closed.
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- For OP-5A reports of troubles received on day of installation before provisioning order is closed as

complete. • For OP-5B: Trouble Reports for which U S WEST has no record of a pending order.		
Product Reporting:	**Standards:**	
MSA-Type Disaggregation -	**OP-5A**	**OP-5B**
• Resale		Diagnostic
Residential single line service	Parity with retail service	
Business single line service	Parity with retail service	
Centrex	Parity with retail service	
Centrex 21	Parity with retail service	
PBX Trunks	Parity with retail service	
Basic ISDN	Parity with retail service	
Megabit	Parity with retail service	
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service	
Density-Type Disaggregation-		
• Resale		
Primary ISDN	Parity with retail service	
DS0	Parity with retail service	
DS1	Parity with retail service	
DS3 and higher bit-rate services (aggregate)	Parity with retail service	
Frame Relay	Parity with retail service	
• LIS Trunks	Parity with U S WEST Interoffice Trunks (separately reported)	
• Unbundled Dedicated Interoffice Transport (UDIT)		
UDIT – DS1 level	Parity with retail DS1 Private Lines	
UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level	
• Unbundled Loops:		
Analog Loop	Parity with retail Res and Bus POTS with dispatch	

Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1
DS1-capable Loop	Parity with retail DS1
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail MegaBit with dispatch
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available: OP-5A (except as noted below) • Under Development: • OP-5A - Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • OP-5A - Disaggregation of Unbundled Loop types and UDITS for repair – beginning with Jun 00 data on the Jul 00 report • OP-5B – beginning with Sep 00 data on the Oct 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

OP-6 – Delayed Days

Purpose:
Evaluates the extent U S WEST is late in installing services for customers, focusing on the average number of days that late orders are completed beyond the committed due date.

Description:
OP-6A – Measures the average number of business days that service is delayed beyond the original due date provided to the customer for non-facility reasons attributed to U S WEST. All inward orders (Change, New, and Transfer order types) that are completed/closed during the reporting period, but later than the original due date assigned by U S WEST, are measured, subject to exclusions specified below.

OP-6B – Measures the average number of business days that service is delayed beyond the original due date provided to the customer for facility reasons attributed to U S WEST. All inward orders (Change, New, and Transfer order types) that are completed/closed during the reporting period, but later than the original due date assigned by U S WEST due to facility reasons, are measured, subject to exclusions specified below.

Reporting Period: One month	**Unit of Measure:** Average Business Days

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for products/services listed under Product Reporting under "MSA-type Disaggregation" will be reported for OP-6A and OP-6B according to orders involving: .1 Dispatches within MSAs; .2 Dispatches outside MSAs; and .3 No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: .4 In High Density areas; and .5 In Low Density areas.

Formula:
OP-6A = ([(Actual Completion Date of late order for non-facility reasons) – (Original Due Date of late order)] / (Total Number of Late Orders for non-facility reasons)

OP-6B = ([(Actual Completion Date of late order for facility reasons) – (Original Due Date of late order)] / (Total Number of Late Orders for facility reasons)

Exclusions: Orders delayed due to Customer reasons are excluded.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• Resale –	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with retail service
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
Density-Type Disaggregation -	
• Resale	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service

DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (separately reported)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line- Service
UDIT – Above DS1 level	Parity with retail Private Line- Services above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS with dispatch
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail MegaBit, with dispatch
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate Private Line services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available: Performance results and statistical parameters (except as noted below) • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

OP-7 – Coordinated "Hot Cut" Interval – Unbundled Loop

<table>
<tr><td colspan="3">Purpose:
Evaluates the duration of completing coordinated "hot cuts" of unbundled loops, focusing on the time actually involved in disconnecting the loop from the U S WEST network and connecting/testing the loop.</td></tr>
<tr><td colspan="3">Description:
Measures the average time to complete coordinated "hot cuts" for unbundled loops, based on intervals beginning with the "lift" time and ending with the completion time of U S WEST's applicable tests for the loop.
• Includes all coordinated hot cuts of unbundled loops that are completed/closed during the reporting period, subject to exclusions specified below.
• "Hot cut" refers to moving the service of existing customers from U S WEST's switch/frames to the CLEC's equipment, via unbundled loops, that will serve the customers.
• "Lift" time is defined as when U S WEST disconnects the existing loop.
• "Completion time" is defined as when U S WEST completes the applicable tests after connecting the loop to the CLEC.</td></tr>
<tr><td colspan="2">Reporting Period: One month</td><td>Unit of Measure: Minutes and seconds</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate and individual CLEC results</td><td colspan="2">Disaggregation Reporting: Statewide level.</td></tr>
<tr><td colspan="3">Formula:
([Completion time – Lift time] / (Total Number of unbundled loops with coordinated cutovers completed in the reporting period)</td></tr>
<tr><td colspan="3">Exclusions:
Time intervals during the cutover process associated with CLEC-caused delays.</td></tr>
<tr><td colspan="2">Product Reporting: Coordinated Unbundled Loops – Reported separately for:
• Analog Loops
• All other Loop Types</td><td>Standard: Diagnostic in light of OP-13 (Coordinated Cuts On Time)</td></tr>
<tr><td colspan="2">Availability:
• Under Development:
  • beginning with Apr 00 data on the Jun 00 report</td><td>Notes:</td></tr>
</table>

OP-8 – Number Portability Timeliness

Purpose:
Evaluates the timeliness of cutovers of local number portability (LNP).

Description:
OP-8B – Coordinated Local Number Portability (LNP) Timeliness (percent): Measures the percentage of coordinated LNP triggers set prior to the scheduled start time for the loop.

- All orders for LNP coordinated with unbundled loops that are completed/closed during the reporting period are measured, subject to exclusions specified below.
- "Scheduled start time" is defined as the confirmed appointment time (as stated on the FOC), or a newly negotiated time.

OP-8C – Non-Coordinated LNP Triggers Set on Time (percent): Measures the percentage of LNP triggers set prior to the Frame Due Time established by the CLEC when placing the order.

- All orders for LNP for which coordination was not requested are included.
- For purposes of these measurements (OP-8B and -8C), "trigger" refers to the "10-digit unconditional trigger" or Line Side Attribute (LSA) that is set or translated by U S WEST.

Reporting Period: One month	**Unit of Measure:** Percent of triggers set on time
Reporting Comparisons: CLEC aggregate and individual CLEC results	**Disaggregation Reporting:** Statewide level.

Formula:
OP-8B = [(Number of LNP triggers set before the loop "lay" time) / (Total Number of LNP activations coordinated with unbundled loops completed)] x 100
OP-8C = [(Number of LNP triggers set before the Frame Due Time) / (Total Number of LNP activation completed)] x 100

Exclusions: CLEC-caused delays in trigger setting.

Product Reporting: None	**Standard:** 95%
Availability: • Under Development – beginning with Apr 00 data on the Jun 00 report	**Notes:**

OP-13 – Coordinated Cuts On Time – Unbundled Loop

Purpose:
Evaluates the percentage of coordinated cuts of unbundled loops that are completed on time, focusing on cuts completed within one hour of the committed order due time and the percent that were started without CLEC approval.

Description:

- Includes all LSRs for coordinated cuts of unbundled loops that are completed/closed during the reporting period, subject to exclusions specified below.
- OP-13A – Measures the percentage of LSRs (CLEC orders) for all coordinated cuts of unbundled loops that are started and completed on time. For coordinated loop cuts to be counted as "on time" in this measurement, the CLEC must agree to the start time, and U S WEST must (1) receive verbal CLEC approval before starting the cut, (2) complete the physical work and appropriate tests, (3) complete the U S WEST portion of any associated LNP orders and (4) call the CLEC with completion information, all within one hour of the committed order due time.
- OP-13B – Measures the percentage of all LSRs for coordinated cuts of unbundled loops that are actually started without CLEC approval.
- The "actual start" time is defined as the time U S WEST "lifts" the loop.
- "Scheduled start time" is defined as the confirmed appointment time (as stated on the FOC), or a newly negotiated time.
- The "committed order due time" is based on the number and type of loops involved in the cut and is calculated by adding the applicable time interval from the following list to the scheduled start time:
- Analog unbundled loops:

1 to 16 lines:	1 Hour
17 to 24 lines:	2 Hours
25+ lines:	Project*

- All other unbundled loops:

1 to 5 lines:	1 Hour
6 to 8 lines:	2 Hours
9 to 11 lines:	3 Hours
12 to 24 lines:	4 Hours
25+ lines:	Project*

*For Projects, the committed order due times, scheduled due dates, and appointment times will be negotiated between CLEC and U S WEST.

- "Actual end time" is defined as when U S WEST notifies the CLEC that the U S WEST physical work and the appropriate tests have been successfully accomplished, including the U S WEST portion of any coordinated LNP orders.

Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: CLEC aggregate and individual CLEC results	**Disaggregation Reporting:** Statewide level. Results for this measurement will be reported according to: OP-13A Cuts Completed On Time OP-13B Cuts Started Without CLEC Approval

OP-13 – Coordinated Cuts On Time – Unbundled Loop (continued)

<table>
<tr><td colspan="2">Formula:
• OP-13A = (Count of LSRs for Coordinated Unbundled Loop cuts completed "On Time") / (Total Number of LSRs for Coordinated Unbundled Loop Cuts completed in the reporting period) x 100
• OP-13B = (Count of LSRs for Coordinated Unbundled Loop cuts whose actual start time occurs without CLEC approval) / (Total Number of LSRs for Coordinated Unbundled Loop Cuts completed in the reporting period) x 100</td></tr>
<tr><td colspan="2">Exclusions:
Applicable to OP-13A:
• Time intervals during the cutover process associated with CLEC-caused delays;
• CLEC not ready by 30 minutes after the Appointment Time.
• Loop cuts that involve CLEC-requested non-standard methodologies, processes, or timelines.</td></tr>
<tr><td>Product Reporting: Coordinated Unbundled Loops – Reported separately for:
• Analog Loops
• All Other Loops</td><td>Standard:
OP-13A: 95 Percent or more
OP-13B: Diagnostic</td></tr>
<tr><td>Availability:
• Under Development – beginning with Apr 00 data on the Jun 00 report</td><td>Notes:</td></tr>
</table>

OP-15 – Interval for Pending Orders Delayed Past Due Date

Purpose:
Evaluates the extent to which U S WEST's pending orders are late, focusing on the average number of days the pending orders are delayed past the due date, as of the end of the reporting period.

Description:
OP-15A - Measures the average number of business days that pending orders are delayed beyond the original due date for reasons attributed to U S WEST.

- Includes all pending inward orders (Change, New, and Transfer order types) for which the original due date assigned by U S WEST has been missed, subject to exclusions specified below.

OP-15B – Reports the number of pending orders measured in the numerator of OP-15A that were delayed for U S WEST facility reasons.

Reporting Period: One month	**Unit of Measure:** OP-15A – Average Business Days OP-15B – Number of orders pending facilities

Reporting Comparisons: CLEC aggregate, individual CLEC, U S WEST retail	**Disaggregation Reporting:** Statewide level. • Results for products/services listed under Product Reporting under "MSA-type Disaggregation" will be reported for OP-15A and OP-15B according to orders involving: 1 Dispatches within MSAs; 2 Dispatches outside MSAs; and 3 No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated for OP-15A and OP-15B according to installations: 4 In High Density areas; and 5 In Low Density areas.

Formula:
OP-15A - ([(Last Day of Reporting Period) – (Original Due Date of Late Pending Order)] / (Total Number of Pending Orders Delayed for U S WEST reasons as of the last day of Reporting Period)
OP-15B - (Count of pending orders measured in numerator of OP-15A that were delayed for U S WEST facility reasons

Exclusions:
- Pending orders delayed due to Customer reasons are excluded.

Product Reporting:	**Standards:** OP-15B = diagnostic only
MSA-type Disaggregation -	For OP-15A:
• Resale	
Residential single line service	Diagnostic (Expectation: Parity with retail service)
Business single line service	Diagnostic (Expectation: Parity with retail service)
Centrex	Diagnostic (Expectation: Parity with retail service)
Centex 21	Diagnostic (Expectation: Parity with retail service)
PBX Trunk	Diagnostic (Expectation: Parity with retail service)
Basic ISDN	Diagnostic (Expectation: Parity with retail service)
Megabit	Diagnostic (Expectation: Parity with retail service)
• Unbundled Network Element – Platform (UNEP) (POTS)	Diagnostic (Expectation: Parity with retail service)

Density-type Disaggregation -	
• Resale	
Primary ISDN	Diagnostic (Expectation: Parity with retail service)
DS0	Diagnostic (Expectation: Parity with retail service)
DS1	Diagnostic (Expectation: Parity with retail service)
DS3 and higher bit-rate services (aggregate)	Diagnostic (Expectation: Parity with retail service)
Frame Relay	Diagnostic (Expectation: Parity with retail service)
• LIS Trunks	Diagnostic (Expectation: Parity with U S WEST Interoffice Trunks) (separately reported)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Diagnostic (Expectation: Parity with DS1 Private Line- Service)
UDIT – Above DS1 level	Diagnostic (Expectation: Parity with Private Line- Services above DS1 level)
• Unbundled Loops:	
Analog Loop	Diagnostic (Expectation: Parity with retail Res and Bus POTS with dispatch)
Non-loaded Loop (2-wire)	Diagnostic (Expectation: Parity with retail ISDN BRI)
Non-loaded Loop (4-wire)	Diagnostic (Expectation: Parity with retail DS1)
DS1-capable Loop	Diagnostic (Expectation: Parity with retail DS1)
ISDN-capable Loop	Diagnostic (Expectation: Parity with ISDN-BRI)
ADSL-qualified Loop	Diagnostic (Expectation: Parity with retail MegaBit with dispatch)
Loop types of DS3 or higher bit rate (aggregate)	Diagnostic (Expectation: Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Diagnostic (Expectation: Parity with retail E911/911 Trunks)
Availability: • Under Development – • Products reported with Density-type Disaggregation - beginning with Apr 00 data on the Jul 00 report • Products reported with MSA-type Disaggregation - beginning with Apr 00 data on the Aug 00 report	**Notes:**

Maintenance and Repair

MR-3 – Out of Service Cleared within 24 Hours

Purpose:
Evaluates timeliness of repair for specified services, focusing on cases where the out-of-service cases were closed within the standard estimate for specified services (i.e., 24 hours for out-of-service conditions).

Description:
Measures the percentage of out of service trouble reports, involving specified services, that are cleared within 24 hours of receipt of trouble reports from CLECs or from retail customers.

- Includes all trouble reports, closed during the reporting period, which involve a specified service that is out-of-service (i.e., unable to place or receive calls), subject to exclusions specified below.
- Time measured is from date and time of receipt to date and time trouble is indicated as cleared.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be disaggregated and reported according to trouble reports involving: MR-3A Dispatches within MSAs; MR-3B Dispatches outside MSAs; and MR-3C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: MR-3D In High Density areas; and MR-3E In Low Density areas.

Formula:
(Number of Out of Service Trouble Reports Closed within 24 hours) / (Total Number of Out of Service Trouble Reports Received) x 100

Explanation: Percentage is obtained by dividing the total number of OOS reports closed within 24 hours by the total number of OOS reports received during the measurement period.

Exclusions:

- Trouble reports coded as follows:
- For products measured from MTAS data (products listed for MSA-type disaggregation), trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13);
- For products measured from WFA (Workforce Administration) data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
- Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Time delays due to "no access" are excluded from repair time.
- Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	

MR-3 – Out of Service Cleared within 24 Hours (Continued)

• **Resale**	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with retail service
Density-Type Disaggregation -	
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2 wire)	Parity with retail ISDN-BRI
ADSL-qualified Loop	Parity with retail MegaBit
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with appropriate retail service
Availability: • Available – all products except disaggregation by loop types and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-4 – All Troubles Cleared within 48 hours

Purpose:
Evaluates timeliness of repair for specified services, focusing on trouble cases of all types (both out of service and service affecting) and on the number of such cases closed within the standard estimate for specified services (i.e., 48 hours for service-affecting conditions).

Description:
Measures the percentage of trouble reports, for specified services, that are cleared within 48 hours of receipt of trouble reports from CLECs or from retail customers.

- Includes all trouble reports, closed during the reporting period, which involve a specified service, subject to exclusions specified below.
- Time measured is from date and time of receipt to date and time trouble is indicated as cleared.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be disaggregated and reported according to trouble reports involving: MR-4A Dispatches within MSAs; MR-4B Dispatches outside MSAs; and MR-4C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: MR-4D In High Density areas; and MR-4E In Low Density areas

Formula:
[(Total Maintenance Reports Completed within 48 hours) / (Total Maintenance Reports Closed)] x 100

Exclusions:

- Trouble reports coded as follows:
- For products measured from MTAS data (products listed for MSA-type disaggregation), trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13);
- For products measured from WFA (Workforce Administration) data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
- Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Time delays due to "no access" are excluded from repair time.
- Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• **Resale**	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service

MR-4 – All Troubles Cleared within 48 Hours (Continued)

Megabit	Parity with retail service
Density-Type Disaggregation -	
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2 wire)	Parity with retail ISDN-BRI
ADSL-qualified Loop	Parity with retail MegaBit
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with appropriate retail service
Availability: • Available – all products except disaggregation by loop types and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-5 – All Troubles Cleared within 4 hours

Purpose:
Evaluates timeliness of repair for specified services, focusing on all trouble cases of all types (including out of service and service affecting troubles) and on the number of such cases closed within the standard estimate for specified services (i.e., 4 hours).

Description:
Measures the percentage of trouble reports for specified services that are cleared within 4 hours of receipt of trouble reports from CLECs or from retail customers.

- Includes all trouble reports, closed during the reporting period, which involve a specified service, subject to exclusions specified below.
- Time measured is from date and time of receipt to date and time trouble is cleared.

Reporting Period: One month	**Unit of Measure**: Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. Results for listed products will be disaggregated according to trouble reports: MR-5A In High Density areas; and MR-5B In Low Density areas.

Formula:
[(Number of Trouble Reports Closed within 4 hours) / (Total Trouble Reports Received)] x 100

Exclusions:

- Trouble reports coded as follows:
- For products measured from MTAS data (products listed for MSA-type disaggregation), trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13);
- For products measured using WFA (Workforce Administration) data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
- Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Time delays due to "no access" are excluded from repair time.
- Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standards:**
• **Resale:**	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (reported separately)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with DS1 Private Line Service
UDIT – Above DS1 level	Parity with Private Line- Services above DS1 level
• Unbundled Loops:	
Non-loaded Loop (4-wire)	Parity with retail DS1

MR-5 – All Troubles Cleared within 4 hours (continued)

DS1-capable Loop	Parity with retail DS1
ISDN-capable Loop	Parity with retail ISDN BRI
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available — all products except unbundled loop type disaggregation and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-6 – Mean Time to Restore

Purpose: Evaluates timeliness of repair, focusing how long it takes to restore services to proper operation.	
Description: Measures the time actually taken to resolve requests for repair. • Includes all trouble reports closed during the reporting period, subject to exclusions specified below. • Includes customer direct reports, customer-relayed reports, and test assist reports.	
Reporting Period: One month	**Unit of Measure:** Hours and Minutes
Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be reported according to orders involving: MR-6A Dispatches within MSAs; MR-6B Dispatches outside MSAs; and MR-6C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: MR-6D In High Density areas; and MR-6E In Low Density areas.
Formula: ([(Date & Time Repair Ticket Closed) – (Date & Time of Repair Report)] / (Total number of repair reports)	
Exclusions: • Trouble reports coded as follows: • For products measured from MTAS data (products listed for MSA-type disaggregation), trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13); • For products measured from WFA (Workforce Administration) data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE). • Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed). • Information tickets generated for internal U S WEST system/network monitoring purposes. • Time delays due to "no access" are excluded from repair time. • Reports of problems received on day of installation before provisioning order is closed as complete.	

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with retail service
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
Density-Type Disaggregation -	
• Resale	
Primary ISDN	Parity with retail service

MR-6 – Mean Time to Restore (Continued)

DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line
UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail MegaBit
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate Private Line services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
• **Availability:** Available – all products except unbundled loop type disaggregation and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	

MR-7 – Repair Repeat Report Rate

Purpose:
Evaluates the accuracy of repair actions, focusing on the number of repeated trouble reports received for the same trouble within a specified period (30 calendar days).

Description:

Measures the percentage of repair reports that are repeated within 30 days.

- Includes all trouble reports closed during the reporting period that are received within thirty (30) days of the previous trouble report for the same service (regardless of whether the report is about the same type of trouble for that service), subject to exclusions specified below.
- Includes reports due to U S WEST network or system causes, customer-direct and customer-relayed reports.
- The period measured is from date and time of last report completed to date and time of next report.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. • Results for product/services listed in Product Reporting under "MSA-Type Disaggregation" will be reported according to orders involving: MR-7A Dispatches within MSAs; MR-7B Dispatches outside MSAs; and MR-7C No dispatches. • Results for products/services listed in Product Reporting under "Density-type Disaggregation" will be disaggregated according to installations: MR-7D In High Density areas; and MR-7E In Low Density areas.

Formula:
([(Total repeated repair reports occurring within 30 calendar days of initial trouble report) / (Total number of Trouble Reports in the reporting period)] x 100).

Exclusions:

- Trouble reports coded as follows:
- For products measured from MTAS data (products listed for MSA-type disaggregation), trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13);
- For products measured from WFA (Workforce Administration) data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).
- Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standards:**
MSA-Type Disaggregation -	
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with retail service

MR-7 – Repair Repeat Report Rate (Continued)

• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
Density-Type Disaggregation -	
• Resale	
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (reported separately)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line
UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail MegaBit
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate Private Line services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available – all products except unbundled loop type disaggregation and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation – beginning with Jun 00 data on the Jul 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-8 – Trouble Rate

Purpose: Evaluates the overall rate of trouble reports as a percentage of the total installed base of the service or element.
Description: Measures trouble reports by product and compares them to the number of lines in service. • Includes all trouble reports closed during the reporting period, subject to exclusions specified below. • Includes all applicable trouble reports, including those that are out of service and those that are only service-affecting.

Reporting Period: One month	**Unit of Measure**: Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting**: Statewide level.

Formula: [(Total number of trouble reports involving the specified service grouping) / (Total number of the specified services that are in service in the reporting period)] x 100
Exclusions: • Trouble reports coded as follows: • For products measured from MTAS data, trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13); • For products measured from WFA data (products listed for Density-type disaggregation) trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE). • Subsequent trouble reports (i.e., redundant reports for the same trouble before it is closed). • Information tickets generated for internal U S WEST system/network monitoring purposes. • Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standards:**
• Resale	
Residential single line service	Parity with retail service
Business single line service	Parity with retail service
Centrex	Parity with retail service
Centrex 21	Parity with retail service
PBX Trunks	Parity with retail service
Basic ISDN	Parity with retail service
Megabit	Parity with MegaBit service
Primary ISDN	Parity with retail service
DS0	Parity with retail service
DS1	Parity with retail service
DS3 and higher bit-rate services (aggregate)	Parity with retail service
Frame Relay	Parity with retail service
• Unbundled Network Element – Platform (UNEP) (POTS)	Parity with like retail service
• LIS Trunks	Parity with U S WEST Interoffice Trunks (reported separately)
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Parity with retail DS1 Private Line Service

MR-8 – Trouble Rate (continued)

UDIT – Above DS1 level	Parity with retail Private Lines above DS1 level
• Unbundled Loops:	
Analog Loop	Parity with retail Res and Bus POTS
Non-loaded Loop (2-wire)	Parity with retail ISDN BRI
Non-loaded Loop (4-wire)	Parity with retail DS1 Private Line
DS1-capable Loop	Parity with retail DS1 Private Line
ISDN-capable Loop	Parity with retail ISDN BRI
ADSL-qualified Loop	Parity with retail MegaBit
Loop types of DS3 and higher bit-rates (aggregate)	Parity with retail DS3 and higher bit-rate services (aggregate)
• E911/911 Trunks	Parity with retail E911/911 Trunks
Availability: • Available – all products except unbundled loop type disaggregation, Centrex 21, DSO, Resale Basic ISDN, USW Retail Interoffice trunks, E911 Trunks, and retail comparable for unbundled loops • Under Development: • Retail comparable for unbundled loop – beginning with Jun 00 data on the Jul 00 report • Unbundled loop type disaggregation, Centrex 21, DSO, Resale Basic ISDN – beginning with Jun 00 data on the Jul 00 report • USW Retail Interoffice trunks and E911 Trunks – beginning with Aug 00 data on the Sep 00 report • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-9 – Repair Appointments Met

Purpose:
Evaluates the extent to which U S WEST repairs services for Customers by the appointment date and time.

Description:
Measures the percentage of repair reports for which the appointment date and time is met.

- Includes all trouble reports closed during the reporting period, subject to exclusions specified below.
- Time measured is from date and time of receipt to date and time trouble is indicated as closed.

Reporting Period: One month	**Unit of Measure:** Percent

Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level. Results for listed services will be disaggregated and reported according to orders involving: MR-9A Dispatches within MSAs; MR-9B Dispatches outside MSAs; and MR-9C No dispatches.

Formula:
[(Total Maintenance Reports Closed by appointment date and time) / (Total Maintenance Reports Received)] x 100

Exclusions:

- Trouble reports coded as follows:
- For products measured from MTAS data, trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13);
- Subsequent trouble reports (i.e., redundant reports for the same trouble before the ticket is closed).
- Information tickets generated for internal U S WEST system/network monitoring purposes.
- Reports of problems received on day of installation before provisioning order is closed as complete.

Product Reporting:	**Standard:** Parity
Resale: Residential single line service Business single line service Centrex PBX Trunks Basic ISDN Unbundled Elements – Platform (UNEP) (POTS)	
Availability: • Available: • Performance results and statistical parameters (except as noted below) • Under Development: • Statistical parameters for comparison of unbundled loop results with specified retail comparative - beginning with Jun 00 data on the Jul 00 report	**Notes:**

MR-10 – Customer-Related Trouble Reports

Purpose: Evaluates the extent that trouble reports were customer related, and provides diagnostic information to help address potential issues that might be raised by the core maintenance and repair performance indicators.
Description: Measures the percentage of all trouble reports that are attributed to the customer as a percentage of all trouble reports resolved during the reporting period, subject to exclusions specified below. Includes trouble reports closed during the reporting period coded as follows: • For products measured from MTAS data, trouble reports coded to disposition codes for: Customer Action (6); Trouble Beyond the Network Interface (12); and Miscellaneous – Non-Dispatch, non-U S WEST (includes CPE, Customer Instruction, Carrier, Alternate Provider (13); • For products measured from WFA (Workforce Administration) data trouble reports coded to trouble codes for Carrier Action (IEC) and Customer Provided Equipment (CPE).

Reporting Period: One month	**Unit of Measure:** Percent
Reporting Comparisons: CLEC aggregate, individual CLEC and U S WEST Retail results	**Disaggregation Reporting:** Statewide level.

Formula: (Number of Trouble Reports coded to disposition codes specified above) / (Total Number of Trouble Reports)
Exclusions: • Subsequent trouble reports (i.e., redundant reports for the same trouble before it is resolved). • Information tickets generated for internal U S WEST system/network monitoring purposes.

Product Reporting:	**Standards:**
• Resale	
Residential single line service	Diagnostic
Business single line service	Diagnostic
Centrex	Diagnostic
Centrex 21	Diagnostic
PBX Trunks	Diagnostic
Basic ISDN	Diagnostic
Megabit	Diagnostic
• Unbundled Network Element – Platform (UNEP) (POTS)	Diagnostic
• Resale	
Primary ISDN	Diagnostic
DS0	Diagnostic
DS1	Diagnostic
DS3 and higher bit-rate services (aggregate)	Diagnostic
Frame Relay	Diagnostic
• LIS Trunks	Diagnostic
• Unbundled Dedicated Interoffice Transport (UDIT)	
UDIT – DS1 level	Diagnostic
UDIT – Above DS1 level	Diagnostic
• Unbundled Loops:	
Analog Loop	Diagnostic
Non-loaded Loop (2-wire)	Diagnostic

Non-loaded Loop (4-wire)	Diagnostic
DS1-capable Loop	Diagnostic
ISDN-capable Loop	Diagnostic
ADSL-qualified Loop	Diagnostic
Loop types of DS3 and higher bit-rates (aggregate)	Diagnostic
• E911/911 Trunks	Diagnostic
Availability: • Under Development: • Beginning with Jun 00 data on the Jul 00 report	**Notes:**

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
COMMISSIONER
JIM IRVIN
CHAIRMAN
WILLIAM A. MUNDELL
COMMISSIONER

IN THE MATTER OF U S WEST COMMUNICATIONS, INC'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	**DOCKET NO. T-00000B-97-0238**

SUPPLEMENTAL AFFIDAVIT

OF

MARGARET S. BUMGARNER

U S WEST COMMUNICATIONS

JUNE 30, 2000

I. IDENTIFICATION OF AFFIANT

My name is Margaret S. Bumgarner. I am employed by U S WEST Communications (U S WEST) as a Director in the Markets Strategy organization. My business address is Room 2803, 1600 7th Avenue, Seattle, Washington, 98191.

II. Purpose of Supplemental Affidavit

The purpose of my supplemental affidavit is to provide updated and additional evidence for checklist item No. 11 – number portability. My initial affidavit in this docket was filed over a year ago and, since that time, there has been significant progress in the deployment of long-term number portability (LNP) and process enhancements for U S WEST's provision of number portability in Arizona.

III. Checklist Item No. 11 - Number Portability

Overview

U S WEST has made significant progress deploying long-term number portability (LNP) in Arizona with over 98 percent of its access lines converted to LNP and plans to be 100 percent converted to LNP in Arizona by October 2, 2000. U S WEST has continued to evolve and improve its LNP provisioning and repair processes, including the offering of out-of-hours provisioning of LNP. U S WEST is currently implementing the new performance measures for number portability developed in the Arizona workshops which are planned to be available during July 2000. Number portability has clearly been a successful competitive tool in Arizona with 224,291 telephone numbers ported as of the end of April 2000.

LNP Deployment

U S WEST completed its initial deployment of long-term number portability (LNP) in the Phoenix MSA on August 3, 1998 and the Tucson MSA on November 2, 1998. Since that time, U S WEST has deployed LNP based on bona fide requests received from Competitive Local Exchange Carriers (CLECs), according to the FCC's rules. U S WEST has completed LNP deployment in 161 switches in Arizona making LNP available to over 98 percent of U S WEST's access lines in Arizona.

U S WEST only has six more switches to convert to LNP in Arizona. The Pima and Safford switches will be converted to LNP on July 3, 2000. The Benson, Saint David, Munds Park, and Page switches will convert to LNP on October 2, 2000, making LNP available to 100% of U S WEST's access lines in Arizona. The LNP deployment schedule is available on U S WEST's Network Disclosure website[1] and is included in the national Local Exchange Routing Guide. Exhibit MSB-13 is the LNP deployment schedule for all U S WEST switches in Arizona.

As of April 30, 2000, U S WEST has ported 224,291 telephone numbers in Arizona and 832,563 telephone numbers region-wide. In Arizona alone, there were over 15,000 telephone numbers ported in January and over 24,000 telephone numbers ported during the month of February 2000. Due to the significant deployment of LNP in Arizona, there has been no interim number portability (INP) activity in Arizona for over a year. Exhibit MSB-14 shows how many numbers have been ported monthly using INP and LNP in Arizona.

LNP Processes

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1 U S WEST's Network Disclosure website for scheduled LNP conversions: www.uswest.com/com/disclosures/netdisclosure414/indexcontent.html.

U S WEST's LNP process team has continued to meet weekly to improve the provisioning and repair processes for LNP. U S WEST has provided timely updates of the documentation of procedures to CLECs for ordering, provisioning, maintenance and repair of number portability arrangements. The documentation of U S WEST's LNP methods and procedures is sent directly to the CLECs and is included in the Interconnect and Resale Resource Guide which is available on U S WEST's website[2].

One significant change to U S WEST's LNP process has been the offering of out-of-hours provisioning. Due to requests by several CLECs, U S WEST began trialing out-of-hours LNP provisioning on Saturdays in August 1999 and expanded that trial to include out-of-hours provisioning for any day (twenty-four hours a day, seven days a week) in November 1999. The out-of-hours provisioning of LNP is now a standard product offering. Out-of-hours provisioning of LNP in provided for in the SGAT section 10.2.6. The out-of-hours process is also described in the IRRG.

U S WEST provides long-term number portability (LNP) using the Location Routing Number (LRN) architecture. LRN is an addressing and routing method that allows the re-homing of individual telephone numbers to other switches through use of a database. With LRN, each public network switch is assigned a ten-digit LRN, the first six digits of which identify the address of that switch. Each customer's telephone number is matched in a regional database with the LRN for the switch that currently serves that telephone number. The Number Portability Administration Center (NPAC) database is currently provided and administered by NeuStar as a neutral third party administrator. Unlike interim number portability methods, LNP does not operate by

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2 Interconnect and Resale Resource Guide website: http://www.uswest.com/carrier.

routing a telephone call through the U S WEST central office switch that originally served the specific telephone number. An Advanced Intelligent Network ("AIN") trigger, the Line Side Attribute ("LSA"), also called the "10-digit unconditional trigger", causes a query to be launched to a local LNP database to determine the new routing address and sends the call to the switch that currently serves that telephone number for call completion.

U S WEST has exerted considerable effort over the past year with switch and system development and improved processes to mechanize and increase the pre-setting of the LSA triggers in its switches. The pre-setting of the LSA triggers allows the CLEC to control the activation of number portability on the due date. The translation in the switch of a LSA trigger, referred to as "setting a trigger", causes call termination within the original "donor" switch to a specific line's telephone number to be suspended and a query is sent to the LNP database for routing information. If the telephone number in the LNP database shows that the number has not been ported yet, the call is terminated in the original switch as usual. If the telephone number in the LNP database shows that porting has been activated by the CLEC, the new routing information is returned and the call is routed to the CLEC's switch for call termination. When the LSA trigger is set on a telephone number prior to the Frame Due Time or prior to the start time of an unbundled loop cutover, the CLEC controls the activation of number portability. Exhibit MSB-16 illustrates the long-term number portability ("LNP") provisioning process and timeline.

U S WEST has resolved an issue concerning the reassignment, or duplicate assignment of ported numbers. When U S WEST initially deployed its new number administration system, Customer Number ("CNUM"), there were occasions when U S WEST reassigned the CLEC's ported numbers to one of its retail customers. That

meant that two customers had the same telephone number. When U S WEST identified what was causing the reassignment of some ported numbers in August 1999, it immediately took corrective action and put processes in place to prevent the release of ported numbers into its number assignment system. When U S WEST began to receive trouble reports about reassignment of ported numbers, the project team deploying CNUM found that some ported numbers were not being marked as unavailable for assignment. The project team found that extracts of data (i.e., reports) from U S WEST's number portability database were missing some of the telephone numbers ported. These extracts had been used to update the status of telephone numbers in the new CNUM system. The telephone numbers were actually present in the number portability database, and there was no impact on the functioning of number portability.

Once U S WEST identified this issue, it made a trouble report to the number portability database vendor. The vendor fixed the problem on October 3, 1999. Proprietary Exhibit MSB-17 is the vendor letter advising U S WEST that the system problem had been corrected with a resynchronization of the database. To ensure the accuracy of its database, the CNUM project team re-verified the ported numbers for all states for all prefixes (NXXs) that had already been converted to CNUM. This verification was completed by the end of October 1999. The conversion to CNUM has also been completed and the statusing of numbers is now done in the ordinary course through service orders, and not from the number portability database. The number portability database was only used during the conversion period as a source of information to identify ported numbers. No further problems have been experienced since October 1999 with reassignment of ported numbers.

Performance Indicators

U S WEST is currently implementing the new performance indicators for long-term number portability (LNP) developed in the Arizona workshops. The Performance Indicator Descriptions ("PIDs") developed by the Arizona workshops for Number Portability – OP-8B and OP-8C – are in Exhibit MSB-15. These performance measurements are planned to be available during July 2000. The following is a brief description of the two performance measures for number portability:

1 OP-8B Coordinated Local Number Portability (LNP) Timeliness (percent). This performance indicator measures the percentage of LSA triggers, also referred to as LNP triggers, that U S WEST translates ("sets") in the switch prior to the scheduled start time for the unbundled loop cutovers. The unbundled loop cutovers require coordination between U S WEST and the CLEC. If the LSA trigger is set prior to the start of the cutover, the CLEC controls the activation of number portability without the need for any involvement by or coordination with U S WEST.

2 OP-8C Non-Coordinated LNP Triggers Set on Time (percent). This performance indicator measures the percentage of LSA triggers that U S WEST sets prior to the Frame Due Time (FDT) for all LNP orders for which coordination is not required. The FDT is established by the CLEC on their service order. If the LSA trigger is set prior to the FDT, the CLEC controls the activation of number portability without the need for any involvement by or coordination with U S WEST.

IV. Summary and Conclusion

Interconnection agreements approved in Arizona and the SGAT make number portability available to CLECs. U S WEST has successfully deployed long-term number portability (LNP), according to the Act and the FCC's rules and schedule, making LNP

currently available to over 98 percent of U S WEST's access lines in Arizona. U S WEST has documented processes and procedures for implementation of number portability and has continued to evolve those processes to improve the provisioning of number portability, including the availability of out-of-hours provisioning which several CLECs had requested. As of April 30, 2000, U S WEST has ported 224,291 telephone numbers in Arizona and 832,563 telephone numbers region-wide. I have shown that U S WEST provides number portability in Arizona that satisfies the requirements of the Act and the FCC. Therefore, I recommend that the Commission find that U S WEST has satisfied the requirements of Section 271(c)(2)(B)(xi) Number Portability.

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
COMMISSIONER
JIM IRVIN
CHAIRMAN
WILLIAM A. MUNDELL
COMMISSIONER

IN THE MATTER OF U S WEST COMMUNICATIONS, INC'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	)	**DOCKET NO. T-00000B-97-0238**

EXHIBITS OF

MARGARET S. BUMGARNER

U S WEST COMMUNICATIONS

JUNE 30, 2000

INDEX OF EXHIBITS

DESCRIPTION	EXHIBIT
Local Number Portability – Switch Deployment List – Arizona	MSB-13
INP / LNP Numbers Ported – Arizona	MSB-14
Number Portability Performance Indicator Descriptions (PIDs)	MSB-15
Local Number Portability – Provisioning Process and Timeline	MSB-16
Vendor Letter re: ASMS [Proprietary]	MSB-17

Local Number Portability
Arizona Switch Deployment List

Locality State	Switch	Locality Name	Portable Indicator	LNP Date
AZ	AGFIAZSRDS0	SUNRISE	YES	08/03/98
AZ	ASFKAZMARS1	ASHFORK	YES	09/03/99
AZ	AZCYAZ03RS1	ARIZONA CITY	YES	08/03/98
AZ	BCKYAZMARS1	BUCKEYE	YES	08/03/98
AZ	BISBAZMARS1	BISBEE	YES	09/03/99
AZ	BLCNAZMARS1	BLACK CANYON	YES	01/14/00
AZ	BNSNAZMADS0	BENSON	S	10/02/00
AZ	BNSNAZSDDS0	SAINT DAVID	S	10/02/00
AZ	BRDSAZMADS0	BEARDSLEY	YES	08/03/98
AZ	CHNDAZMADS0	CHANDLER MAIN	YES	08/03/98
AZ	CHNDAZRSRS1	OCOTILLO	YES	08/03/98
AZ	CHNDAZSLRS1	GALVESTON	YES	08/03/98
AZ	CHNDAZSODS0	CHANDLER SOUTH	YES	08/03/98
AZ	CHNDAZWEDS0	CHANDLER WEST	YES	07/27/98
AZ	CHVYAZMARS1	CHINO VALLEY	YES	09/03/99
AZ	CLDGAZMARS1	COOLIDGE	YES	08/03/98
AZ	CMVRAZMARS1	CAMP VERDE	YES	09/03/99
AZ	CMVRAZRRRS1	CMVR RIM ROCK	YES	09/03/99
AZ	CRCYAZMARS1	CIRCLE CITY	YES	08/03/98
AZ	CRNDAZMADS1	CORONADO	YES	08/03/98
AZ	CSGRAZMADS0	CASA GRANDE	YES	08/03/98
AZ	CTWDAZEARS1	COTTONWOOD EAST	YES	09/03/99
AZ	CTWDAZMADS0	COTTONWOOD	YES	09/03/99
AZ	CTWDAZSORS1	COTTONWOOD SOUTH	YES	09/03/99
AZ	CVCKAZMADS0	CAVE CREEK	YES	08/03/98
AZ	DDVLAZMARS1	DUDLEVILLE	YES	08/03/98
AZ	DGLSAZMARS1	DOUGLAS	YES	09/03/99
AZ	DRVYAZNODS0	DEER VALLEY	YES	08/03/98
AZ	ELOYAZ01RS1	ELOY	YES	08/03/98
AZ	FLGSAZEADS0	FLAGSTAFF EAST	YES	09/03/99
AZ	FLGSAZMADS0	FLAGSTAFF	YES	09/03/99
AZ	FLGSAZSORS1	FLAGSTAFF	YES	09/03/99
AZ	FLRNAZMARS1	FLORENCE	YES	08/03/98
AZ	FTMDAZMADS0	FORT MCDOWELL	YES	08/03/98
AZ	FTMDAZNORS1	RIO VERDE	YES	08/03/98
AZ	GDYRAZCWDS0	GDYR-COLDWATER	YES	08/03/98
AZ	GLBNAZMARS1	GILA BEND	YES	08/03/98
AZ	GLDLAZMACG0	GLENDALE	YES	08/03/98
AZ	GLDLAZMARS1	GLENDALE MAIN RS1	YES	08/03/98
AZ	GLOBAZMARS1	GLOBE	YES	09/03/99
AZ	GNVYAZMADS0	GREEN VALLEY	YES	08/03/98
AZ	GRCNAZMARS1	GRAND CANYON	YES	09/03/99
AZ	HGLYAZMADS0	HIGLEY	YES	08/03/98
AZ	HGLYAZQCDS0	HIGLEY QUEEN CREEK	YES	08/03/98
AZ	HMBLAZMARS1	HUMBOLDT	YES	09/03/99

AZ	HYDNAZMARS1	HAYDEN	YES	08/03/98
AZ	JSCYAZMARS1	JOSEPH CITY	YES	09/03/99
AZ	KRNYAZMARS1	KEARNY	YES	08/03/98
AZ	LTPKAZMADS0	LITCHFIELD PARK	YES	07/09/99
AZ	MARNAZ02RS1	MARANA WEST	YES	11/02/98
AZ	MARNAZ03RS1	MARANA SOUTH	YES	11/02/98
AZ	MARNAZMARS1	MARANA MAIN	YES	11/02/98
AZ	MAYRAZMARS1	MAYER	YES	09/03/99
AZ	MESAAZGIDS0	MESA GILBERT	YES	07/27/98
AZ	MESAAZMADS0	MESA MAIN	YES	07/27/98
AZ	MIAMAZMARS1	MIAMI	YES	09/03/99
AZ	MMTHAZMARS1	MAMMOTH	YES	08/03/98
AZ	MRCPAZMARS1	MARIOCPA	YES	08/03/98
AZ	MSPKAZMADS0	MUNDS PARK	S	10/02/00
AZ	NGLSAZ03RS2	RIO RICO	YES	10/12/99
AZ	NGLSAZMARS1	NOGALES MAIN	YES	10/12/99
AZ	NGLSAZMWDS0	NOGALES MDWY	YES	10/12/99
AZ	NWRVAZMARS1	NEW RIVER	YES	08/03/98
AZ	ORCLAZMARS1	ORACLE	YES	08/03/98
AZ	PAGEAZMADS0	PAGE	S	10/02/00
AZ	PHNXAZ81DS0	PHNX FOOTHILL	YES	08/03/98
AZ	PHNXAZ93RS1	SUNNYSLOPE DUNLAP	YES	07/27/98
AZ	PHNXAZBWDS0	BETHANY WEST	YES	08/03/98
AZ	PHNXAZCADS0	PHNX CACTUS	YES	07/27/98
AZ	PHNXAZEADS0	PHOENIX EAST	YES	07/27/98
AZ	PHNXAZEARS1	PHOENIX EAST	YES	07/27/98
AZ	PHNXAZGRDS0	PHOENIX GREENWAY	YES	07/27/98
AZ	PHNXAZLVDS0	PHNX LAVEEN	YES	07/27/98
AZ	PHNXAZMA01T	PHNX MA LATA TDM	YES	07/27/98
AZ	PHNXAZMA04T	PHNX MA LATA TDM	YES	07/27/98
AZ	PHNXAZMADS1	PHNX MAIN DS1	YES	07/27/98
AZ	PHNXAZMADS4	PHNX MAIN	YES	07/27/98
AZ	PHNXAZMRDS0	PHOENIX MIDRIVERS (NEW SWITCH)	YES	01/21/00
AZ	PHNXAZMRRS1	PHNX-MID RIVERS ISDN	YES	08/03/98
AZ	PHNXAZMYDS0	PHNX-MAYVALE	YES	02/10/99
AZ	PHNXAZNEDS0	PHNX NORTHEAST	YES	07/27/98
AZ	PHNXAZNODS1	PHNX NORTH	YES	07/27/98
AZ	PHNXAZNODS2	PHNX NORTH ACD	YES	08/03/98
AZ	PHNXAZNODS3	PHNX NORTH	YES	07/27/98
AZ	PHNXAZNORS0	PHNX NORTH ISDN	YES	07/27/98
AZ	PHNXAZNWDS0	PHOENIX NORTHWEST	YES	07/27/98
AZ	PHNXAZNWRS1	PHNX NORTHWEST ISDN	YES	07/27/98
AZ	PHNXAZPPDS0	PHNX PECOS	YES	08/03/98
AZ	PHNXAZPRCG0	PHOENIX PEORIA	YES	07/27/98
AZ	PHNXAZPRDS0	PHNX PEORIA CAP	YES	02/17/99
AZ	PHNXAZSECG0	PHOENIX SOUTHEAST	YES	07/27/98
AZ	PHNXAZSEDS0	PHNX SOUTHEAST CAP	YES	03/10/99
AZ	PHNXAZSOCG0	PHOENIX SOUTH	YES	07/27/98
AZ	PHNXAZSYDS0	PHOENIX SUNNYSLOPE	YES	07/27/98
AZ	PHNXAZSYRS1	PHNX-SUNNYSLOPE RS1	YES	07/27/98
AZ	PHNXAZWECG0	PHOENIX WEST	YES	07/27/98

AZ	PHNXAZWEDS0	PHOENIX WEST CAP	YES	03/03/99
AZ	PHNXAZWERS1	PHNX WEST ISDN	YES	07/27/98
AZ	PIMAAZMARS1	PIMA	S	07/03/00
AZ	PINEAZMARS1	PINE	YES	09/03/99
AZ	PLMNAZMARS1	PALOMINAS	YES	09/03/99
AZ	PRSCAZEARS2	PRESCOTT EAST	YES	09/03/99
AZ	PRSCAZMADS0	PRESCOTT	YES	09/03/99
AZ	PRVYAZPPDS0	PHOENIX PINNACLE PEAK	YES	08/03/98
AZ	PTGNAZELRS1	PATAGONIA/ELGIN	YES	09/03/99
AZ	PTGNAZMARS1	PATAGONIA	YES	09/03/99
AZ	PYSNAZMADS0	PAYSON	YES	09/03/99
AZ	SCDLAZMADS0	SCOTTSDALE MAIN	YES	07/27/98
AZ	SCDLAZSHDS0	SCOTTSDALE SHEA	YES	08/03/98
AZ	SCDLAZTHDS0	SCOTTSDALE THUNDERBIRD	YES	07/27/98
AZ	SEDNAZMADS0	SEDONA	YES	04/28/00
AZ	SEDNAZSORS3	SEDONA SOUTH	YES	04/28/00
AZ	SFFRAZMADS0	SAFFORD	S	07/03/00
AZ	SMTNAZMARS1	SOMERTON	YES	09/03/99
AZ	SNMNAZMADS0	SAN MANUEL DS0	YES	08/03/98
AZ	SPRRAZMARS1	SUPERIOR	YES	08/03/98
AZ	SPRSAZEADS0	SUPERSTITION EAST	YES	08/03/98
AZ	SPRSAZMACG0	SUPERSTITION MAIN	YES	08/03/98
AZ	SPRSAZWEDS0	SUPERSTITION WEST	YES	08/03/98
AZ	SRVSAZMADS0	SIERRA VISTA	YES	09/03/99
AZ	SRVSAZNORS1	SRVS NORTH	YES	09/03/99
AZ	STFDAZMARS1	STANFIELD	YES	08/03/98
AZ	TCSNAZCADS0	TCSN CATALINA	YES	11/02/98
AZ	TCSNAZCODS0	TUCSON CORTARO	YES	11/02/98
AZ	TCSNAZCRCG0	TUCSON CRAYCROFT	YES	11/02/98
AZ	TCSNAZCRDS0	TCSN CRAYCROFT CAP	YES	03/10/99
AZ	TCSNAZEADS0	TUCSON EAST	YES	11/02/98
AZ	TCSNAZEARS1	TUCSON EAST	YES	11/02/98
AZ	TCSNAZFWDS0	TCSN FLOWING WELLS	YES	11/02/98
AZ	TCSNAZMA04T	TCSN MAIN	YES	11/02/98
AZ	TCSNAZMADS1	TUCSON MAIN	YES	11/02/98
AZ	TCSNAZMLRS2	TUCSON MOUNT LEMMON	YES	11/02/98
AZ	TCSNAZNOCG0	TUCSON NORTH	YES	11/02/98
AZ	TCSNAZNODS0	TUCSON NORTH CAP	YES	11/02/98
AZ	TCSNAZRMRS1	TCSN SHERIDAN	YES	11/02/98
AZ	TCSNAZRNDS0	TUCSON RINCON (New Switch)	YES	12/17/99
AZ	TCSNAZRNRS1	TUCSON RINCON	YES	11/02/98
AZ	TCSNAZRURS1	TCSN CARDINAL	YES	11/02/98
AZ	TCSNAZSERS3	TCSN SOUTHEAST	YES	11/02/98
AZ	TCSNAZSERS4	TCSN SOUTHEAST	YES	11/02/98
AZ	TCSNAZSOCG0	TUCSON SOUTH	YES	11/02/98
AZ	TCSNAZSODS0	TCSN SOUTH CAP	YES	11/02/98
AZ	TCSNAZSORS0	TUCSON SOUTH	YES	11/02/98
AZ	TCSNAZSWDS0	TCSN SOUTHWEST	YES	11/02/98
AZ	TCSNAZTVDS0	TUCSON TANQUE VERDE	YES	11/02/98
AZ	TCSNAZWERS1	TCSN WEST	YES	11/02/98
AZ	TEMPAZMADS0	TEMPE MAIN	YES	07/27/98

AZ	TEMPAZMCCG0	TEMPE MCCLINTOCK	YES	07/27/98
AZ	TEMPAZMCDS0	TEMPE MCCLINTOCK CAP	YES	07/27/98
AZ	TLSNAZMARS1	TOLLESON	YES	08/03/98
AZ	TMBSAZMARS1	TOMBSTONE	YES	09/03/99
AZ	TNCKAZMARS1	TONTO CREEK	YES	09/03/99
AZ	TUBCAZMARS1	TUBAC	YES	10/12/99
AZ	VAILAZNORS1	VAIL NORTH	YES	11/02/98
AZ	VAILAZSODS0	VAIL SOUTH	YES	11/02/98
AZ	WCBGAZMARS1	WICKENBURG	YES	08/03/98
AZ	WHTKAZMARS2	WHITE TANKS	YES	08/03/98
AZ	WHTLAZMADS0	WHITLOW	YES	08/03/98
AZ	WLCXAZMARS1	WILLCOX	YES	03/08/00
AZ	WLMSAZMARS1	WILLIAMS	YES	09/03/99
AZ	WLTNAZMARS1	WELLTON	YES	09/03/99
AZ	WNBGAZ01RS1	WINTERSBURG	YES	08/03/98
AZ	WNSLAZMADS1	WINSLOW	YES	09/03/99
AZ	YRNLAZMARS1	YARNELL	YES	09/03/99
AZ	YUMAAZFTDS1	YUMA FORTUNA	YES	09/03/99
AZ	YUMAAZMADS0	YUMA MAIN	YES	09/03/99
AZ	YUMAAZSEDS0	YUMA SOUTHEAST	YES	09/03/99

S = Scheduled
U S WEST website: http://www.uswest.com/disclosures/netdisclosure414/az.html

INP/LNP Numbers Ported - Arizona

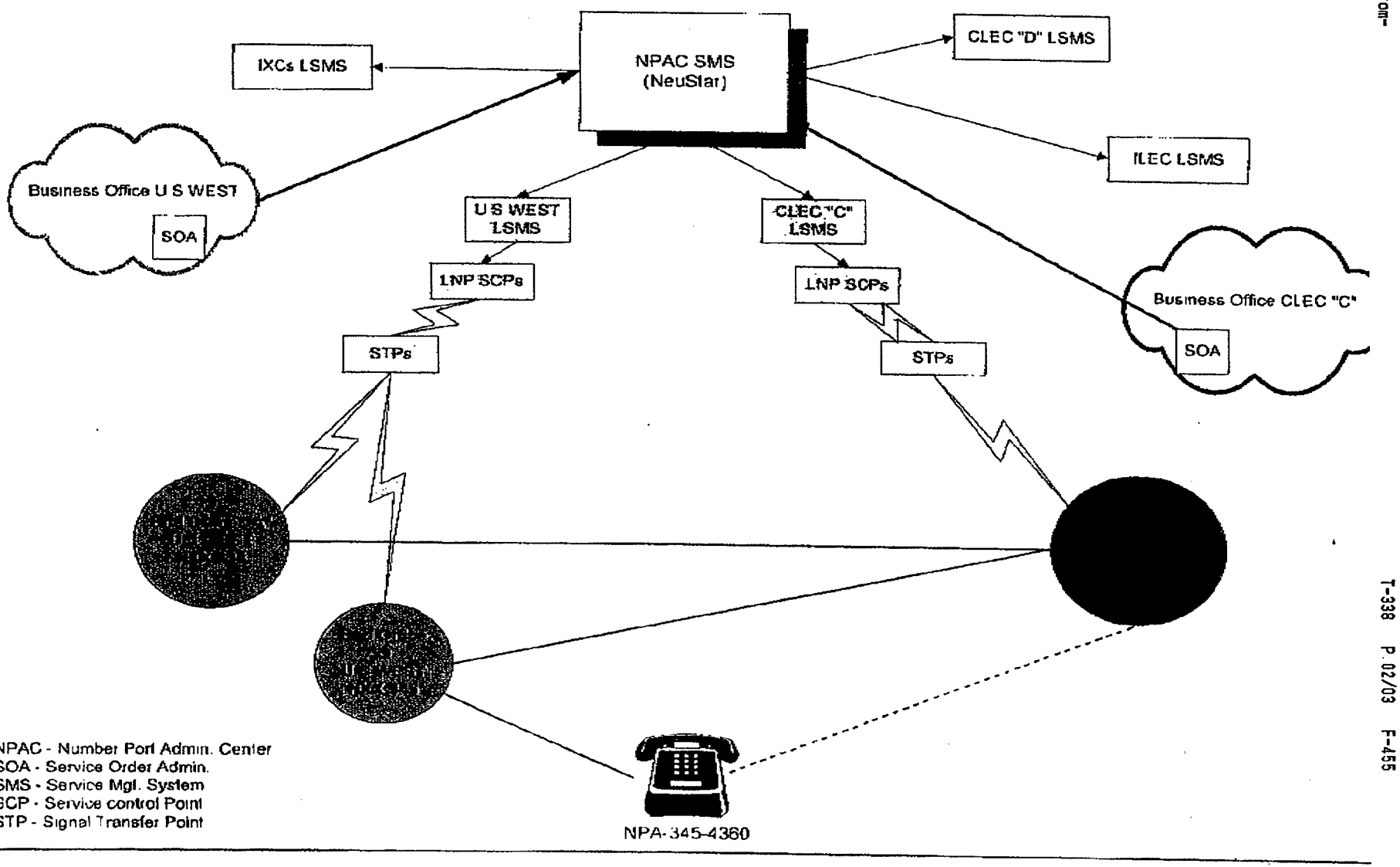
	Monthly Transition TNs from INP to LNP	Monthly LNP TNs Incl Transition	Monthly New INP TNs
Total 96	0	0	0
Total 97	0	0	542
Total 98	2,135	14,858	9,946
January-99	813	10,256	0
February-99	1,666	11,724	0
March-99	973	7,086	0
April-99	477	17,385	0
May-99	3,454	14,565	0
June-99	152	9,496	0
July-99	2,001	17,186	0
August-99	7	25,191	0
September-99	2	16,502	0
October-99	800	8,972	0
November-99	500	9,538	0
December-99	0	5,785	0
January-00	1	15,308	0
February-00	56	24,057	0
March-00	21	7,219	0
36617	0	6,857	0

	Cum. Net LNP TNs	Cum. Net INP TNs	Cum. All Ported TNs
Total - 96	0	0	0
Total - 97	0	5,418	5,418
Total - 98	14,858	13,229	28,087
January-99	25,114	12,416	37,530
February-99	36,838	10,750	47,588
March-99	43,924	9,777	53,701
April-99	61,309	9,300	70,609
May-99	75,847	5,846	81,693
June-99	85,370	5,694	91,064
July-99	102,556	3,693	106,249
August-99	127,747	3,686	131,433
September-99	144,249	3,684	147,933
October-99	153,221	2,884	156,105
November-99	162,759	2,384	165,143
December-99	168,544	2,384	170,928
January-00	183,852	2,383	186,235
February-00	207,909	2,327	210,259
March-00	215,128	2,306	217,434
36617	221,985	2,306	224,291

OP-8 – Number Portability Timeliness

<table>
<tr><td colspan="2">Purpose:
Evaluates the timeliness of cutovers of local number portability (LNP).</td></tr>
<tr><td colspan="2">Description:
OP-8B – Coordinated Local Number Portability (LNP) Timeliness (percent): Measures the percentage of coordinated LNP triggers set prior to the scheduled start time for the loop.
• All orders for LNP coordinated with unbundled loops that are completed/closed during the reporting period are measured, subject to exclusions specified below.
• "Scheduled start time" is defined as the confirmed appointment time (as stated on the FOC), or a newly negotiated time.
OP-8C – Non-Coordinated LNP Triggers Set on Time (percent): Measures the percentage of LNP triggers set prior to the Frame Due Time established by the CLEC when placing the order.
• All orders for LNP for which coordination was not requested are included.
• For purposes of these measurements (OP-8B and -8C), "trigger" refers to the "10-digit unconditional trigger" or Line Side Attribute (LSA) that is set or translated by U S WEST.</td></tr>
<tr><td>Reporting Period: One month</td><td>Unit of Measure: Percent of triggers set on time</td></tr>
<tr><td>Reporting Comparisons: CLEC aggregate and individual CLEC results</td><td>Disaggregation Reporting: Statewide level.</td></tr>
<tr><td colspan="2">Formula:
OP-8B = [(Number of LNP triggers set before the loop "lay" time) / (Total Number of LNP activations coordinated with unbundled loops completed)] x 100
OP-8C = [(Number of LNP triggers set before the Frame Due Time) / (Total Number of LNP activation completed)] x 100</td></tr>
<tr><td colspan="2">Exclusions: CLEC-caused delays in trigger setting.</td></tr>
<tr><td>Product Reporting: None</td><td>Standard: 95%</td></tr>
<tr><td>Availability:
• Under Development – beginning with Apr 00 data on the Jun 00 report</td><td>Notes:</td></tr>
</table>

LOCAL NUMBER PORTABILITY



NPAC - Number Port Admin. Center
SOA - Service Order Admin.
SMS - Service Mgt. System
SCP - Service control Point
STP - Signal Transfer Point

Local Number Portability (LNP) Provisioning Timeline
(Three Day Due Date)
Shared Responsibility of Three Parties

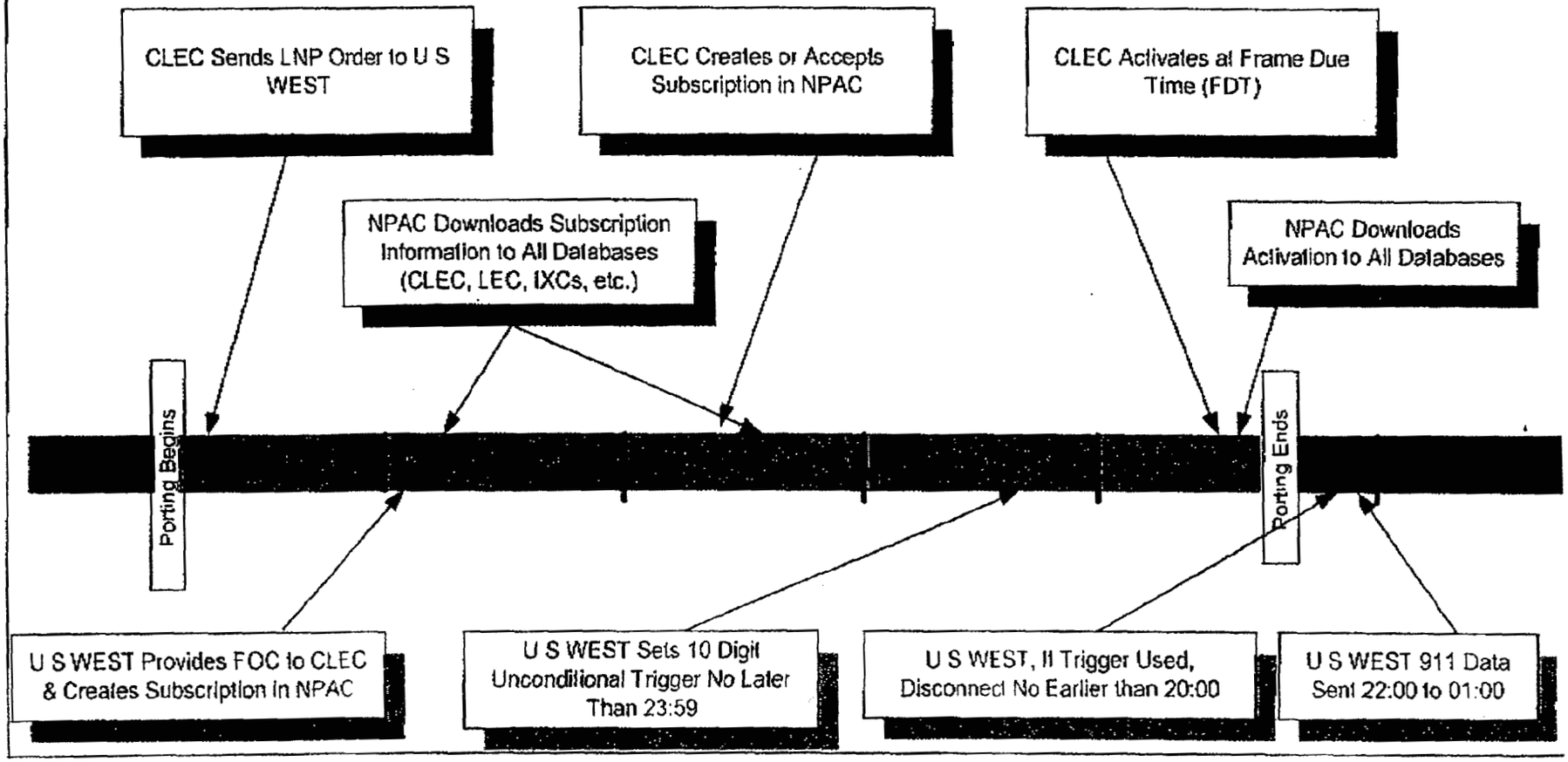


EXHIBIT MSB-17

Confidential & Proprietary

(Redacted Version)

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF U S WEST COMMUNICATIONS, INC'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	DOCKET NO. T-00000B-97-0238

SUPPLEMENTAL AFFIDAVIT OF

THOMAS R. FREEBERG

U S WEST COMMUNICATIONS

JUNE 30, 2000

Affidavit Index

Affidavit Index i

Identification of Affiant 1

Purpose of Affidavit 1

Executive Summary 2

Checklist Item 1 -- Interconnection 5

Interconnection Overview 5
Interconnection at Any Technically Feasible Point 5
Standard Interconnection Arrangements Provided by U S WEST 6
Ordering Interconnection 7
U S WEST Provides Interconnection at Least "Equal in Quality" 10
U S WEST Network Trunk Design Standards 11
Interconnection Performance Measures 13
Trunk Blocking Measures 15
Trunk Installation 17
Repair Quality 19
Interconnection Trunking Summary 21

Checklist Item 1 -- Collocation 22

FCC Collocation Rules: First Report and Order 24
"706" and DC Court Federal Collocation Rules 25
U S WEST's Compliance with the FCC Collocation Rules 27
Three Step Collocation Provisioning Process 31
Collocation Performance Measures 34
Collocation Feasibility 34
Collocation Installation 36
Collocation Summary 38

CONCLUSION 40

INDEX OF EXHIBITS 43

QUALIFICATION OF THOMAS R. FREEBERG 44

Identification of Affiant

My name is Thomas R. Freeberg. I am employed by U S WEST Communications ("U S WEST") as a Director in the Wholesale Local Markets division. My business address is 301 W. 65th St, Suite 100, Richfield, Minnesota 55423. My qualifications are provided in Exhibit TRFS-01. I have adopted a March 1999 affidavit filed in this proceeding by Michael J. Weidenbach.

Purpose of Affidavit

The purpose of this supplemental affidavit is to provide current evidence supplementing the record that U S WEST continues to satisfy the requirements for interconnection trunking and collocation, checklist item one of Section 271 of the Telecommunications Act of 1996 (Act) and various Federal Communications Commission (FCC) orders interpreting the Act. U S WEST's Statement of Generally Available Terms and Conditions (SGAT), the existing interconnection agreements between U S WEST and the processes and procedures employed by U S WEST to make interconnection/collocation available ensure that U S WEST continues to satisfy the requirements of checklist item one. In addition, parties to this docket have developed a series of performance indicators (PIDs), many of which relate to interconnection and collocation, to track how well U S WEST is providing these items to CLECs. U S WEST's actual performance data further establishes that U S WEST is currently furnishing these items in quantities that competitors may reasonably demand and at acceptable levels of quality. In fact, in many instances the data shows that U S WEST provides interconnection to CLECs at a higher level of quality than U S WEST provides to itself and is providing collocation to CLECs at levels that exceed the performance benchmarks agreed to in this docket. Collectively, this

information provides powerful evidence that U S WEST satisfies checklist item 1, interconnection and collocation.

Executive Summary

Checklist item 1 requires U S WEST to make interconnection available to CLECs on a nondiscriminatory basis. U S WEST provides several alternative arrangements to facilitate the interconnection of networks, including physical collocation (four forms), virtual collocation (two forms), mid-span meet arrangements, entrance facilities, and interLocal Calling Area facilities (interLCA, formerly "hub location" or single-point-per-LATA interconnection). These interconnection arrangements are providing for exchange of many traffic types at the line-side of a local switch, the trunk-side of a local switch, the trunk interconnection points for a tandem switch, central office cross-connection points, signal transfer points, and points of access to unbundled network elements.

As of May 1, 2000, over 82,000 interconnection trunks were in service in Arizona. Call volumes carried on these trunks are increasing every month. In January 2000, that volume was 729 million minutes. The volume increased in April 2000 to over 800 million minutes of calls exchanged over interconnection trunks (LIS - Local Interconnection Service).

U S WEST has invested considerable resource and energy into constructing the current level of interconnection. U S WEST centers that fulfill interconnection service orders are staffed with trained personnel who have fulfilled CLEC demand for interconnection in Arizona every day for several years now.

Checklist Item No. 1 also requires U S WEST to provide CLECs with access to collocation such that efficient CLECs have a reasonable opportunity to compete. In Arizona, as of May 1, 2000, U S WEST was providing 257 collocation spaces to 25

CLECs in 61 central office buildings under existing collocation agreements. Confidential Exhibit TRFS-C2 provides more specific detail. Over 87% of U S WEST's retail lines in Arizona are served from these 61 buildings. Additionally, 34 of these 61 central office buildings (56%) currently house three or more collocators' equipment. Thus, CLECs in Arizona are well positioned to serve a vast majority of U S WEST's access lines in Arizona.

There are five standard forms of physical collocation -- caged, shared, cageless, InterConnection Distribution Frame (ICDF) and a new form called Common Area Splitter collocation to support line sharing arrangements. Caged physical collocation allows the CLEC to place its equipment in a secure cage inside U S WEST's building. Shared Physical Collocation allows two CLECs to share space in accord with terms and conditions agreed to between the two CLECs. Cageless physical collocation allows the CLEC to place its equipment in the U S WEST central office in small increments of floor space among U S WEST or other CLEC equipment and not separated from other provider's equipment by a secure barrier. ICDF collocation is offered to CLECs who do not require their active equipment to be placed in the U S WEST Central office, but who do require physical access to unbundled network elements for the purpose of combining. Common Area Splitter Collocation, which is very similar to ICDF Collocation, allows a CLEC to place Digital Subscriber Line (DSL) "splitters" on "common" (shared cageless) floor space in a U S WEST central office building. This affords a CLEC a means of providing advanced data services within the frequency spectrum of an existing U S WEST retail end user's analog voice-grade telephone service. Locating splitters within a CLEC's existing collocation space is, of course, also acceptable.

There are two standard forms of virtual collocation – standard and adjacent. Standard virtual collocation allows a CLEC to deliver equipment to U S WEST for ILEC engineering, installation, and maintenance on behalf of the CLEC. This type of

arrangement is used, principally, when space for physical collocation is unavailable. Adjacent Space Collocation provides CLECs with another option when space is unavailable within a U S WEST central office building. Space may be available in adjacent controlled environmental vaults. Vaults can be owned by U S WEST or can be constructed or procured by a CLEC and placed on U S WEST property. Modular buildings owned or leased by the CLEC and designed for primary telecommunications functions are an alternative to a vault.

U S WEST has provided considerable quantities of interconnection trunking and collocation in conformance with the Act, the FCC's and the ACC's rules. As a result, I urge the Arizona Corporation Commission to find that U S WEST has satisfied checklist item one requirements for interconnection trunking and collocation.

Checklist Item 1 -- Interconnection

Interconnection Overview

The FCC has defined the term interconnection as ". . . the linking of two networks for the mutual exchange of traffic."[1] The traffic that is exchanged is local, toll, and a variety of specialized traffic, such as directory assistance, operator services, and 911.

Section 7.0 of the proposed SGAT describes how U S WEST allows CLECs to interconnect with U S WEST's network for the purpose of exchanging local traffic. As of May 1, 2000 U S WEST was providing interconnection trunking to 16 Arizona facilities-based CLECs, on more than 500 local interconnection trunk groups, with almost 82,000 members (trunks). These trunks were terminated on over 70 U S WEST wire centers in Arizona. Listed below are the types and number of trunk groups in service in Arizona, including the equivalent number of DS0 trunks in service.

Trunk Type	Trunk Groups	Equivalent Trunks in Service
E911	43	164
Local	416	74,654
Operator	44	270
Toll	43	6946
Totals	546	82,034

Confidential Exhibit TRF-C1 provides more specific detail.

Interconnection at Any Technically Feasible Point

In addition to specifying the purposes for which carriers may request interconnection, Section 251(c)(2)(B) obligates incumbent LECs to provide interconnection within their networks at any "technically feasible point." U S WEST

satisfies this requirement by providing CLECs with interconnection at the six minimum points of interconnection defined by the FCC. U S WEST satisfies any other requests for interconnection through the Bona Fide Request Process (BFR).

Standard Interconnection Arrangements Provided by U S WEST

U S WEST has provided several alternative arrangements to enable the interconnection of a CLEC network with U S WEST's network. Section 7.1.2 of the proposed SGAT specifies the legal obligation to provide these methods of interconnection.[2] Four standard interconnection arrangements are (1) collocation, (2) mid-span meet, (3) entrance facility and (4) interLocal Calling Area (LCA) facility. Since the first three forms of interconnection were described thoroughly in previously filed direct testimony, only interLCA facility, formerly "hub location" or single-point-per-LATA interconnection is described in this supplemental testimony.

When a CLEC locates its switch outside a U S WEST local calling area with which it seeks to interconnect, an interLCA facility can be purchased from U S WEST to extend the carriers' point of interface to the distant local calling area.[3] Alternatively, the CLEC may construct a facility from its switch into the next U S WEST local calling area it wishes to serve. In the past, when a U S WEST interLCA facility served this function, multiple orders had to be prepared. Previous approaches to interLCA facility interconnection involved the submission of at least three Access Service Requests. Each request required specific efforts on the part of both carriers to associate related orders. Work-arounds had to be devised to cope with multiple orders and inadvertent out-of-sequence order processing. U S WEST's InterLCA facility product eliminates

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1 47 C.F.R. 51.5.

2 First Interconnection Order at para. 551 through 553.

3 FCC First Report and Order, cc Docket 96-98, rele. August 8, 1996, Section IX, para. 49.

these problems, brings wireless and wireline interconnection approaches more closely into alignment, and results in more consistently and efficiently provisioned interconnection. InterLCA facilities are further described in the SGAT at Section 7.1.2.4.

Ordering Interconnection

U S WEST utilizes a time tested procedure for ordering interconnection. Initially, the CLEC representative and the CLEC's U S WEST Account Manager host a joint planning meeting to lay out a proposed trunking interconnection. At this meeting, or prior to it, the CLEC is asked to submit an initial forecast, which will provide information on the amount of traffic to be delivered to each end office impacted by the exchange of traffic. The forecast includes the requirements for each type of trunk group for tandem-switched traffic and the quantity of tandem-switched traffic forecasted for each subtending end office. The U S WEST Joint Planning organization represents the Network organization in these meetings. They will review the quantity of trunks and facilities needed, and assist with routing and due date requirements for the CLEC trunk orders. The U S WEST State Interconnection Managers will assist the Account Managers with any operational issues on initial CLEC turn up, major projects, or mandates by the state commissions.

The Forecast to Order Comparison and Statistical Tool has been developed to be the centralized forecast entry system for Local Interconnection Service and Wireless trunking and is currently in implementation stages. This tool will be used by the Joint Planning group to compare the CLEC forecasts with the orders for these services. The goal of this system is to develop effective and accurate data with which to determine the demand on U S WEST facilities, based on knowledge of the utilization of existing trunks by a CLEC and the level of trunks being forecasted by the CLEC. It will provide U S WEST with the information to understand and analyze the

CLEC requirements on its network resources. This meeting precedes submission of initial interconnection orders (Access Service Requests or "ASRs").

The CLEC and U S WEST ascertain each other's interconnection requirements culminating in interconnection orders. The parties provide their best estimates of the traffic distribution to each U S WEST end office and local tandem office. The configuration and due dates for the initial interconnection orders are established. Service intervals typical for U S WEST's Local Interconnection Service (LIS) are contained in the Interconnection and Resale Resource Guide, available on U S WEST's web site. To assist new CLECs with ordering and obtaining interconnection, U S WEST also offers Local Interconnection Service (LIS) training and facility tours. The CLEC identifies training and/or facility tour requirements to the Account Manager who will arrange for the State Interconnect Manager, or other Network representative, to provide needed assistance to the CLEC. U S WEST's Account Teams meet individually with CLEC representatives to understand unique CLEC-specific requirements.

The SGAT defines the responsibilities of both parties regarding the ordering process, including the Joint Planning meeting and the Access Service Request (ASR). The ASR format is defined by the industry standard Access Service Ordering Guidelines (ASOG). Examples of industry-defined information are Network Channel (NC) and Network Channel Interface (NCI) codes. These codes specify the characteristics of the circuit at its connecting points. The SGAT includes the following interconnection ordering process language:

> When ordering LIS, the ordering Party shall specify on the Access Service Request: (ASR) 1) the type and number of Interconnection facilities to terminate at the Point of Interconnection in the Serving Wire Center; 2) the type of interoffice transport, (*i.e.,* Direct Trunked Transport or Tandem Transmission); 3) the number of trunks to be provisioned at an end office or local tandem; and 4) any optional features. When the ordering Party requests facilities, routing, or optional features different than those

determined to be available, the Parties will work cooperatively in determining an acceptable configuration, based on available facilities, equipment and routing plans.[4]

U S WEST and CLECs subsequently participate in quarterly Joint Planning meetings to establish trunk re-design and servicing requirements. The Parties provide forecast information to each other to ensure reliable end user call completion on what are typically two-way trunk groups. The Account Manager and the Joint Planning organization coordinate these quarterly meetings with the CLEC to discuss the CLEC's updated trunk forecast. The Joint Planning organization is responsible for reviewing the CLEC trunk requirements, evaluating existing trunk utilization and the level of trunks being forecasted by the CLEC to establish needed Network resources and facilities. Section 7.2.2.8 of the SGAT defines the responsibilities of both parties regarding the interconnection forecasting process, including: forms and format, required information, forecast cycle, Joint Planning meetings, U S WEST Trunk Group Servicing Request (TGSR) process, and trunk group resizing guidelines.

The parties provide each other with forecasts of trunk utilization for each direct trunk group including the amount of traffic destined to each subtending office for tandem-switched traffic. Trunking requirements are projected for a two-year period. Realizing that construction of new facilities can require six to seven months, these forecasts can facilitate the availability of interconnection facilities at the time of ordering and can avert blockage problems. To the extent an unexpected trunk blockage occurs, either party can initiate a request for additional trunks. Most typically, however, U S WEST takes a subordinate position in the interconnection relationship. That is to say, U S WEST allows a CLEC to determine when a two-way interconnection trunk group needs to be made larger to lower blocking rates. U S WEST facilitates the trunk group servicing process by notifying the CLEC through

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[4] See the SGAT, Section 7.4.1, Ordering Interconnection.

a Trunk Group Servicing Request (TGSR) of its belief that joint action needs to be taken. In this process, the Circuit Administration Center monitors all CLEC 2-way, alternate final, direct final, and high usage trunk groups on a real time basis. The CAC personnel will identify any trunk group that is blocking or overflowing at a level that exceeds the U S WEST thresholds. This information is then documented on a Trunk Group Service Request (TGSR) and submitted to the CLEC and Account Team via electronic mail. The CLEC is asked to respond to the TGSR within 30 days of receipt of the TGSR. Recent improvements to the TGSR process will soon be implemented and include mechanization of the TGSR activity data. To the extent a CLEC has not already done so, and it agrees that blocking is excessive, it may submit an ASR. The TGSR process is discussed further in the next section of this testimony.

U S WEST Provides Interconnection at Least "Equal in Quality"

Section 251(c)(2)(C) requires that the interconnection provided by an incumbent LEC be "at least equal in quality" to that U S WEST provides to itself. Specifically, SGAT Section 7.1.1.1 provides that "The Parties will provide designed interconnection facilities in accordance with current industry standards."

CLECs have the primary role in determining the number of interconnection trunks that they want to utilize in their network. For example, CLECs have placed orders for interconnection facilities based on their business plans, their internal forecasts, and their independent collection of historic traffic volumes. Moreover, either party can initiate a request for additional trunks if an unexpected trunk blockage occurs. Similarly, either party can initiate a request to augment existing trunks at any level of blocking that it considers the appropriate trigger for trunk augmentation.

U S WEST has proactively monitored interconnection traffic in Arizona. U S WEST service assurance employees constantly collect traffic data on all

interconnection trunk groups. The traffic data is analyzed in monthly reports such that trunk group blocking beyond incidental levels can be identified.

Based upon this analysis, if blocking for any interconnection two-way trunk group is deemed excessive, U S WEST issues a TGSR to the CLEC. In response to the TGSR, the CLEC can review its traffic data and determine whether or not it believes that augmentation is appropriate. The SGAT describes the TGSR process as follows:

> When appropriate, U S WEST will notify CLEC through the U S WEST Trunk Group Servicing Request (TGSR) process of the need to take action and place orders in accordance with the forecasted trunk requirements.[5]

In Arizona, during the past five months, U S WEST proactively notified CLECs of potential interconnection blocking through the issuance of 60 TGSRs. CLECs responded to 40% of the TGSRs by placing orders to augment or rearrange the trunk groups. However, CLECs responded to 60% of the TGSRs by declining to take corrective action. This data strongly suggests that CLECs bear at least a portion of the responsibility for any excessive blocking that has and/or will occur in Arizona.

U S WEST Network Trunk Design Standards

Network Trunk Design Standards size trunk groups to operate at service objectives. The performance metric for assessing trunk group service performance is call blockage. Call blockage is defined as attempted calls that cannot be further advanced toward the call destination due to equipment shortage or network failure.

U S WEST employs identical standards for interconnection trunking and non-interconnection trunking. The acceptable level of blockage on both direct trunks and tandem trunks have evolved through exhaustive traffic studies, probability theory,

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[5] See the SGAT, Section 7.2.2.8.11, U S WEST's Trunk Group Service Request Process.

technological advances, and the use of economic models to determine the most economical trunking network required to provide the desired quality of "service-blocking objective."[6] The quality of service-blocking objectives is the product of years of analytical work, studies, and experience by the Bell Operating Companies (BOCs).[7]

U S WEST's network layout is based upon the application of these longstanding principles. Trunking theory assumes that all customers will not seek to use the network at the same time. Economic utilization involves designing trunking facilities to industry guidelines. If U S WEST were to design its network so that no call ever blocked, a separate path would be needed between each telephone in the network. For networks of more than a few telephones, this would be cost prohibitive. The solution is to provide switches and fewer call paths (trunks between switches) that many telephones can access at will. This creates a probability that some calls will be blocked.

U S WEST's service-blocking objectives provide high-quality, low-cost trunk facilities as needed by callers. Based upon industry standards, U S WEST designs direct-final trunk[8] groups utilizing a one-percent blocking criterion during the peak hour of operation and designs tandem-connecting[9] alternate-final trunk groups utilizing a one-half of a percent criterion.

U S WEST satisfies the service-blocking objective for CLECs by providing facilities and equipment in sufficient quantities to connect the number of retail customers who might, under busy-hour conditions, simultaneously attempt to pass

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6 The average blocking ratio to which a group of services is engineered or administered.

7 Bellcore, SR-TAP-000191, Issue 2, Trunk Traffic Engineering Concepts and Applications.

8 Direct Final Trunks – A last-choice trunk group for which there is no alternate route ("only route").

calls between networks. One-percent blocking on direct-final groups is a design criterion that achieves an industry-accepted balance between caller expectation and economic efficiency. Day-to-day variations in the level of busy hour[10] traffic can cause blocking of service beyond the design criterion.[11]

U S WEST has generally considered actual blocking on local final trunk groups below a two-percent threshold to be incidental.[12] A CLEC may choose another threshold and build its network to accommodate its desired design. Primary or High-use (non-final) trunk groups are designed to block at higher rates since overflow calls are not blocked, but go to alternate-final groups.

Interconnection Performance Measures

The parties to this docket have spent a considerable amount of time developing performance metrics for tracking U S WEST's wholesale performance, several of which concern interconnection. U S WEST has collected detailed performance data under these interconnection measures. These measures include metrics on trunk provisioning, trunk repair, and network blocking. Performance measurements track how well U S WEST provides interconnection trunking as compared to the interoffice trunks U S WEST provides for itself. These measurements help ensure that CLECs receive interconnection "at least equal in quality".

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9 Tandem-Connecting – A trunk group that interconnects end-offices with tandems and that receives overflow traffic from primary or high-use trunk groups.

10 Busy Hour – A sixty consecutive minute interval with the highest levels of load, used in traffic engineering.

11 Bellcore, SR-TAP-000191, Issue 2, Trunk Traffic Engineering Concepts and Applications, Page 4.

12 For blocking above the two-percent level, see the TGSR process, described in this testimony.

The FCC requires U S WEST to provide CLECs with interconnection equal in quality to that U S WEST provides to itself. As the FCC explained:

> [F]or those functions the BOC provides to competing carriers that are analogous to the functions a BOC provides to itself in connection with its own retail service offerings [i.e. resale], the BOC must provide access to competing carriers in "substantially the same time and manner" as it provides to itself. Thus, where a retail analogue exists, a BOC must provide access that is equal to (i.e., substantially the same as) the level of access that the BOC provides itself, its customers, or its affiliates, in terms of quality, accuracy and timeliness.[13]

Similar performance measurements were developed by Bell Atlantic New York (BA-NY) through its own collaborative process. When the FCC analyzed BA-NY's performance measures it held "to the extent there is no statistically significant difference between Bell Atlantic's provision of service to competitive LECs and its own retail customers, we [the FCC] need not look any further." [14] In other words, when U S WEST provides the Commission with its audited performance data, if its interconnection data is at least statistically equivalent to U S WEST's retail performance, the Commission must find that U S WEST is providing nondiscriminatory access to interconnection. It is only when a "statistically significant difference" exists between U S WEST's interconnection performance and U S WEST's retail performance, that "the Commission will have to examine the evidence further to make a determination whether the statutory nondiscrimination requirements are met.[15] Thus, after this workshop is complete, the Commission's only additional function needs to be to analyze the limited data, if any, where a statistically significant difference exists. With only one exception, which will be discussed below, the actual data shows that U S WEST provides CLECs with interconnection equal in

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[13] Bell Atlantic 271 Order at ¶ 44.

[14] Id. at ¶ 58.

[15] Id. at ¶ 59.

quality. In most instances, the data shows that U S WEST provides CLECs with interconnection that is actually better in quality than that which it provides to itself.

Trunk Blocking Measures

U S WEST and CLEC end offices route originating calls to other end offices by two means – direct and tandem routing. Direct routing allows one end office to transport traffic directly to another end office over a single uninterrupted interoffice facility. Of the 82,000 trunks in service in Arizona on May 1, 2000, over 61,000 trunks were direct trunks. By contrast, tandem routing, allows a CLEC to send, on a single trunk group, calls destined for many end offices to a tandem switch. The tandem switch then relays each call to the appropriate "common" trunk group associated with a terminating end office. A "common" group concurrently carries calls originated by the retail customers of U S WEST and a CLEC.

U S WEST measures trunk blockage (1) on *interconnection* final trunk groups that connect CLEC end offices with U S WEST tandems, and (2) on *interconnection* final trunk groups that directly connect CLEC end offices with U S WEST end offices. For comparison, to ensure it provides interconnection "at least equal in quality," U S WEST also measures blocking on its traditional *interoffice* trunk groups. Thus, U S WEST measures trunk blockage on (1) *interoffice* final trunk groups that connect U S WEST end offices with U S WEST tandems, and (2) *interoffice* final trunk groups that connect one U S WEST end office to another U S WEST end office. These four performance measures allow a direct comparison between the blockage on interoffice (U S WEST) direct trunks as compared to interconnection (CLEC) direct trunks as well as a second comparison of blockage experienced on interoffice tandem trunks as compared to interconnection trunks. These measures are further described as NI-1 in Exhibit TRFS-6 to this affidavit.

U S WEST's actual trunk blockage performance is the only area of interconnection that provides mixed results. In this docket, the parties agreed that U S WEST met its interconnection blockage obligations if blockage was the same or less than retail parity. In addition, even if the CLECs experience more blockage than does U S WEST, the blockage is acceptable if it is less than one percent. Blockage on tandem trunks (NI-1) shows that CLECs have experienced less blockage on such trunks than has U S WEST during three of the first four months of 2000. Because U S WEST has met the Commission's benchmark on this measure, no Commission analysis is required.

As stated above, U S WEST also measures blockage on direct end-office trunks (NI-2). Although blockage on tandem trunks uniformly met the Commission's performance benchmark, blockage on end office trunks fell outside of statistical norms in the first two months of the year. Thus, this it is appropriate for the Commission to conduct additional analysis on this measure. U S WEST asserts that, when fully analyzed, the data supports U S WEST's position that it is providing CLEC's with nondiscriminatory access to interconnection facilities. The trend over each of the first four months of this year has shown substantial improvement as a direct result of U S West's trunk blockage monitoring and servicing processes. Trunk Blockage decreased by 64% from February to March (3.39% to 1.23%), and by another 62% from March to April (1.23% to 0.47%) in large part because U S WEST issued TGSRs encouraging CLECs to augment trunks with undue blockage. For example, in January, CLEC trunk blockage was impacted by four end office groups blocking in the range of 5.00% to 32.00%. U S WEST issued TGSRs and subsequently all four trunk groups were augmented. February results were impacted by sixteen groups blocking in the range of 2.11% to 65.59%. U S WEST again issued TGSRs. Despite that, the CLEC owning the trunk group blocking 65.59% refused to augment the trunk group despite additional escalations by U S WEST about the need to augment. In March, there were eleven trunk groups blocking in the range of 8.51% to 80.11%. TGSRs

were again issued and, once again, in three instances CLECs refused to augment as requested. Although the issuance of TGSRs by the Circuit Administration Center contributed to the significant reductions in blockage and reflects U S WEST's commitment to minimizing CLEC trunk blockage, these facts show that U S WEST cannot be held solely responsible for this trunk blockage. Installation of LIS trunks requires active involvement from the CLEC. U S WEST's uniformly positive data on trunk installation and trunk repair (as will be discussed below) shows that U S WEST installs and repairs trunks in a timely manner. In a virtually identical situation, the Nebraska Commission found that the trunk blockage was an aberration, not attributable to U S WEST and not checklist item number one impacting.

Trunk Installation

For interconnection trunks provided to CLECs, U S WEST measures several aspects of the provisioning process. Specifically, U S WEST tracks the average installation interval (OP-4), the percentage of time it installs a trunk on or before the due date ("commitments met") (OP-3), and for installations that were not completed on time, the average number of days the trunk was installed later than the originally scheduled due date (OP-6). For each of the above interconnection trunk indicators, U S WEST also collects comparable data for its own interoffice trunks to obtain comparable evidence for the internal U S WEST network. With this evidence, the Commission will be able to directly compare trunk installation/provisioning for CLECs and U S WEST.

U S WEST's actual performance data on interconnection trunk installation is universally positive. The PIDs state that U S WEST meets its trunk installation obligations if it provides such installation as well as or better than retail parity. For each of the interconnection trunk installation measures, U S WEST consistently

provided CLECs with better, more timely trunk installation than it did for its own retail organization. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

The monthly average installation intervals demonstrate that CLECs experienced significantly shorter trunk installation intervals than did U S WEST in each of the last four months. The average interval for installation of U S WEST's non-interconnection trunks was more than triple the installation interval of interconnection trunks for CLECs. These results demonstrated that CLECs in Arizona received trunk installation that was "at least equal in quality" to that which U S WEST provided to itself.

As the preceding data indicates, U S WEST also met its trunk installation commitments to CLECs more frequently than it met installation commitments to itself. In each of the four months, U S WEST met its commitments to CLECs at a higher percentage than within the U S WEST network. Again, these results demonstrate that CLECs in Arizona received trunk installation that was "at least equal in quality" to that which U S WEST provides to itself.

In each of the four months, when there was a delay, CLECs' experienced average delays significantly shorter than those experienced by U S WEST. On average, U S WEST experienced delays more than two times longer than CLECs experienced for trunk installation. Thus, while U S WEST installed interconnection trunks for CLECs on schedule a high percentage of the time, when a delay occurred, it was comparatively short.

This data reinforces that CLECs in Arizona received trunk installation that was "at least equal in quality" to that which U S WEST provided to itself.

Repair Quality

U S WEST also tracks several aspects of the trunk repair process. Specifically, U S WEST tracks the quality of ordering and installation of services, focusing on the extent new order installation were free of trouble reports for thirty calendar days following installation and the percentage of new service installations that experienced a trouble report during the period from the installation date to the date the order posted complete. Additionally, U S WEST tracks the percentage of troubles cleared within four hours (MR-5), the mean time to restore trunks that were experiencing trouble (MR-6), the number of times a repaired trunk must be repaired again ("Repair Repeat Report Rate") (MR-7) and the percentage of the total number of trunks that experience a problem ("Trouble Report Rate") (MR-8).

Installation trouble reports are a means of assessing installation quality. By measuring the percentage of newly installed interconnection trunks that generate a trouble report within thirty days of installation, an indication of installation quality is obtained. U S WEST provides a comparable measure for trouble reports on trunks within the U S WEST network.

The speed with which U S WEST clears trouble reports can also be used to evaluate the repair process. U S WEST measures the percentage of interconnection trunk trouble reports that were cleared in less than four hours. Unlike the previous indicator that addressed newly installed trunks, this measure addresses all trouble reports on interconnection trunks, regardless of how recently the trunks were installed. U S WEST will provide a comparable measure for trouble reports on trunks within the U S WEST network, though it is not ready yet.

To capture the overall interconnection trunk repair experience, U S WEST also measures the average time it takes to restore an interconnection trunk. This can be compared to the average time it takes U S WEST to restore interoffice trunks within its

network its network. The Mean Time to Restore is provided in exhibit TRFS-5. These results demonstrate that U S WEST cleared CLEC trouble reports on interconnection trunks in approximately 6 to 8 hours in each of the last four months. Thus, CLECs can count on U S WEST repairing their interconnection trunks on the same day that the trouble is reported. For the two months where comparable data exists, U S WEST cleared troubles for interconnection trunks more quickly than on trunks within U S WEST's network. These results further demonstrate that U S WEST provided interconnection repair to CLECs that was "at least equal to" the quality the repair it provided itself.

These collective results—for trunk installation, repair and blockage--provide a complete picture of how well U S WEST is providing interconnection to CLECs. The data provides compelling evidence that U S WEST is providing interconnection trunking in a timely manner; that CLECs obtained interconnection trunks in quantities that generally provided nondiscriminatory trunk blockage; that the quality of interconnection trunks are high, as demonstrated by the relatively low number of trouble reports generated by CLECs; and that U S WEST's repair of interconnection trunks, when required, is performed responsively.[16]

Just as with trunk installation, U S WEST's actual performance data on interconnection trunk repair is universally positive. The PIDs state that U S WEST meets its trunk repair obligations if it provides such repair as well as or better than retail parity. For each of the interconnection trunk repair measures, U S WEST consistently provided CLECs with better, more timely trunk repair than it did for its own retail organization. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

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[16] The Arizona SGAT, Section 20, will eventually list the performance indicators according to checklist items, and Section 20 Exhibit B will eventually define each performance measure.

Interconnection Trunking Summary

U S WEST satisfies each of the requirements of the Act and the FCC rules with regard to interconnection. U S WEST has a concrete and specific legal obligation to continue to provide interconnection as referenced in the SGAT and the various interconnection agreements between U S WEST and CLECs in Arizona. Checklist item 1 is also satisfied and supported by the specific procedures U S WEST employs to implement interconnection with CLECs. U S WEST has invested considerable resource and energy into constructing the current level of interconnection. U S WEST service centers that fulfill interconnection service orders are staffed with hundreds of trained personnel who have managed CLEC demand for interconnection in Arizona every day for several years now. U S WEST's centers that coordinated the fulfillment of interconnection service orders supported huge volumes of demand across multiple states and trained personnel exist to meet future demand for interconnection in Arizona. Finally, U S WEST tracks performance data on interconnection pursuant to the PIDs developed in this docket. This performance data, with the exception of end office trunk blockage demonstrates that U S WEST provides CLECs with interconnection equal in quality and in many instances better in quality than that which U S WEST provides to itself. U S WEST stands ready to provide additional interconnection to CLECs in Arizona in accordance with the terms of the proposed U S WEST SGAT.

Based on this evidence, I urge the Arizona Commission to find that U S WEST has satisfied the requirements of Checklist Item 1, Interconnection, of Section 271(c)(2)(B)(i) of the Telecommunications Act of 1996.

Checklist Item 1 -- Collocation

The last component of checklist item 1 is collocation. In Arizona, U S WEST is now providing 225 units of physical collocation and 32 units of virtual collocation to 25 CLECs in 61 central office buildings under existing collocation agreements. Confidential Exhibit TRFS-C2 provides specific wire center detail and collocation activity. Over 87% of U S WEST's retail lines in Arizona are served from these 61 buildings. Additionally, 56% of all U S WEST's retail customers in Arizona are served from buildings currently housing three or more collocators' equipment.

There are now five forms of physical collocation -- caged, shared, cageless, InterConnection Distribution Frame (ICDF) collocation and Common Area Splitter collocation.

Caged Physical -- Caged physical collocation allows the CLEC to place its equipment within U S WEST's building surrounded by a secure cage.

Shared Physical -- Under Shared Physical Collocation, one CLEC obtains a Caged Physical Collocation arrangement from U S WEST. A second CLEC may share the first CLEC's space in accord with terms and conditions agreed to between the two CLECs.

Cageless Physical -- Cageless physical collocation allows the CLEC to place its equipment in the U S WEST central office adjacent to U S WEST or other CLEC equipment and separated from other equipment by a secure barrier.

ICDF Collocation -- ICDF collocation is offered to CLECs that do not require active equipment to be placed in the U S WEST central office building, but require physical access to unbundled network elements for the purpose of combining.

Common Area Splitter Collocation -- Common Area Splitter Collocation allows a CLEC to place Digital Subscriber Line (DSL) "splitters" on "common" floor space in a U S WEST central office building. This affords a CLEC a means of providing advanced data services within the spectrum of an existing U S WEST retail end user's analog voice-grade telephone service. Locating splitters in a CLEC's existing collocation space is also acceptable. Common Area Splitter Collocation must be constructed before related line sharing orders can be placed.

There are two forms of virtual collocation – standard and adjacent.

Standard Virtual – Standard virtual collocation allows a CLEC to deliver equipment to U S WEST for ILEC engineering, installation, and maintenance on behalf of the CLEC. This type of arrangement is used, principally, when there is no space for physical collocation.

Adjacent Virtual -- Adjacent Space Collocation allows the CLEC another option when space is unavailable within a U S WEST central office building. Space may be available in adjacent controlled environmental vaults. Vaults can be owned by U S WEST or constructed or procured by a CLEC and placed on U S WEST property. Modular buildings owned or leased by the CLEC and designed for primary telecommunications functions are another alternative to vaults.

Collocation arrangements are available at all U S WEST central office buildings. U S WEST also provides collocation at other U S WEST locations, including adjacent collocation. Finally, as required by FCC order, U S WEST will allow CLECs to use any collocation method used by another incumbent LEC or mandated by the Arizona Commission.

FCC Collocation Rules: First Report and Order

In its First Report and Order, CC Docket 96-325[17], the FCC concluded that it should "adopt explicit national rules to implement the collocation requirement of the 1996 Act." They further found that ". . . specific rules defining minimum requirements for nondiscriminatory collocation arrangements will remove barriers to entry by potential competitors and speed the development of competition."[18]

The "national rules", established by the FCC were codified in their rules found at § 51.323, which can be summarized as follows:

1. Incumbent LECs (ILECs) must offer both physical and virtual collocation.

2. CLECs must use collocated equipment to obtain interconnection or to access unbundled network elements; therefore, collocation of switching equipment is usually not required.

3. Points of interface (POI) provisions are established and at least two such POIs are required at each incumbent LEC premises where the incumbent LEC has at least two entry points. Fiber, copper, coax, and microwave facilities must be accommodated, consistent with state commission-approved interconnection agreements.

4. ILECs must establish provisions for nondiscriminatory allocation of space for the collocation of equipment. Space shall be made available on a first-come, first-served basis. LECs are not required to lease or construct additional space to provide for additional space if existing space is exhausted; however LECs must take collocation demand into account when forecasting growth of facilities. Incumbent LECs may retain space for their own future use, but not on more favorable terms than those of other providers also wishing to reserve space for future growth; however, space reserved for future growth must be relinquished to a virtual collocation request, before denying such a request on the grounds that insufficient space exits. Subject to space constraints and the approval of

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[17] FCC 1st Report and Order, CC Docket No. 96-325, Paragraphs 555-617, § 51.323.

[18] FCC 1st Report and Order, CC Docket No. 96-325, Paragraph 558.

state commissions, ILECs may impose reasonable restrictions on the warehousing of unused space by other collocating providers.

5. ILECs may require reasonable security measures to separate collocation installations from its facilities.

6. ILECs must permit a collocating provider to subcontract the construction of its physical collocation arrangements with contractors approved by the incumbent ILEC.

"706" and DC Court Federal Collocation Rules

In the FCC's Order, CC Docket No. 98-147, Deployment of Wireline Service Offering Advanced Telecommunications Capability, the FCC required incumbent LECs to make new collocation arrangements, including cageless shared, and adjacent collocation available to competing carriers. Under these more recent rules, CLECs were permitted to locate all equipment necessary for interconnection, whether or not such equipment has a switching function.[19] The following is a summary of the newer collocation rules:

1. Incumbent LECs must make available to requesting competitive LECs shared cage and cageless collocation arrangements. Moreover, when collocation is exhausted at a particular LEC location, incumbent LECs must permit collocation in adjacent controlled environmental vaults or similar structures to the extent technically feasible.

2. A collocation method used by one incumbent LEC or mandated by a state commission is presumptively technically feasible for any other incumbent LEC.

3. Incumbent LECs may adopt reasonable security measures to protect their central office equipment.

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[19] FCC Press Release, March 18, 1999, Report No. CC 99-6.

4. Incumbent LECs may not require competitive LEC equipment to meet more stringent safety requirements than those the incumbent LEC imposes on its own equipment.

5. Incumbent LECs must permit competitors to collocate all equipment used for interconnection and/or access to unbundled network elements (UNEs), even if it includes a "switching" or enhanced services function, and incumbent LECs cannot require that the switching or enhanced services functionality of equipment be disengaged.

6. Incumbent LECs must permit a competitive LEC to tour the entire central office in which that competitive LEC has been denied collocation space. Incumbent LECs must provide a list of all offices in which there is no more space. Incumbent LECs must remove obsolete, unused equipment, in order to facilitate the creation of additional collocation space within a central office.

On March 17, 2000, the United States Court of Appeals issued a decision on an appeal of a FCC order on collocation brought by GTE. The Court vacated certain aspects of the decision. The Court identified three specific areas where the FCC rules extended beyond the law. First, the court vacated the requirement that ILECs allow CLECs to connect their collocated equipment to the collocated equipment of other CLECs on the ILECs' premises. The Court found that this requirement "imposes an obligation that has no apparent basis in the statute." Second, the court vacated the requirement that ILECs allow CLECs to collocate equipment with multi-purpose functions, such as equipment capable of performing both multiplexing and switching function. The Court determined that this requirement enables CLECs to collocate "equipment that is not truly 'necessary' for a [CLEC's] 'interconnection or access to [UNEs].'" Third, the court vacated the requirement that ILECs permit CLECs to collocate equipment in any unused space on the ILECs' premises. The Court indicated that nothing in the statue authorizes CLECs, over the objections of ILECs, "to pick and choose space on the [ILECs'] premises . . ."

U S WEST has modified its position as a result of the Court's order. With respect to switching capability that CLECs no longer have a legal right to collocate,

U S WEST took no steps to remove such equipment, including ATM switches and remote switching units. Similarly, U S WEST took no steps to require CLECs to remove existing connections between CLEC collocated equipment for at least six months after the Court's mandate was issued. Moreover, U S WEST honored requests for placement of such both switching equipment and cross-connects if those requests were received prior to March 17, 2000. In effect, U S WEST offers the status quo for existing equipment with the expectation of getting an FCC order by September 17, 2000.

U S WEST's Compliance with the FCC Collocation Rules

U S WEST's legal obligation to provide collocation is established by the Arizona SGAT and the various interconnection agreements between U S WEST and CLECs in Arizona. Section 8 of the SGAT includes the collocation terms and conditions, rate elements, descriptions and arrangements, and the ordering process offered by U S WEST.

U S WEST has implemented policies and procedures that comply with all of the FCC's currently effective rules.[20] In a well defined process, the Product Management team, including a dedicated Collocation Process Manager, is responsible for the timely review, design and implementation of all FCC collocation rules. Product and Process team members meet on a regular basis to establish requirements and policies and procedures, which are then documented and approved by all stakeholders and Legal representatives prior to implementation. The new policies, procedures and processes to support the FCC Rules are then tracked for timely implementation and to ensure employee training on revised and/or new procedures. Subsequent reviews of the process(es) are conducted to ensure full compliance. U S WEST has also recently revised a number of its policies and procedures

included in the SGAT, to comply with the FCC 706 collocation rules. Section 8.0 of U S WEST's SGAT explicitly allows for collocation consistent with the FCC's collocation rules.

Both virtual and physical collocation are available to CLECs throughout Arizona. More than two years ago, U S WEST began offering cageless collocation. Section 8.1.1 of the SGAT describes the standard collocation arrangements offered by U S WEST. In addition, CLECs can obtain nonstandard collocation arrangements through the Bona Fide Request (BFR) process. Through this process, CLECs may obtain collocation outside of the central office or through any collocation method used by another incumbent LECs or mandated by the Arizona Commission. The BFR process is described in the SGAT and the U S WEST Interconnection and Resale Resource Guide. Also, see Confidential Exhibit TRFS-C15.

U S WEST requires CLECs' collocated equipment to meet only safety and earthquake requirements that U S WEST imposes on its own equipment. Section 8.2.2.5 of the SGAT only requires that a CLECs collocated equipment comply with the Telcordia Network Equipment System (NEBS) Level 1 generic requirements TR-NWT-000063 (with the exception of earthquake bracing requirements for cageless physical collocation installations included in NEBS Levels 2 and 3, depending on the location of the earthquake faults). In addition, other U S WEST wire center environmental and transmission standards, and any statutory requirements (local, state or federal). This is expressly permitted by the FCC.[21]

Consistent with the FCC rules, U S WEST allows CLECs to collocate equipment that is necessary for interconnection or access to unbundled network elements (UNEs), regardless of whether such equipment performs a switching

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[20] See Exhibits TRFS-C11-TRFS-C14

function, provides enhanced services capabilities, or offers other functions. Section 8.2.1.2 of the SGAT contains only one limitation on the type of collocated equipment -- CLECs may not collocate equipment that is not necessary for either access to UNEs or for interconnection, such as equipment used exclusively for switching or for enhanced services. The D. C. Circuit Court of Appeals recently interpreted the FCC rules as expressly authorizing this limitation.[22] Moreover, U S WEST will permit collocation of any equipment required by law, unless U S WEST first proves to the Commission that the equipment will not be actually used by a CLEC for the purpose of obtaining interconnection or access to unbundled network elements.

If a collocation request is denied due to lack of space, Section 8.2.1.9 of the SGAT states that upon CLEC request, U S WEST will provide the CLEC with a report containing: available collocation space in a particular U S WEST premises; the number of collocators; any modifications in the use of the space since the last report; and action that U S WEST is taking to make additional space available for collocation. For additional process detail, see Confidential Exhibits TRFS-C11 and TRFS-C12.

Similarly, Section 8.2.1.11 of the SGAT states that, upon request by a CLEC, U S WEST allows a CLEC's representatives to tour the entire wire center premises escorted by U S WEST personnel, within ten days of the denial of collocation space. Such tours are without charge to the CLEC. If, after the tour of the premises, U S WEST and the CLEC disagree about whether space limitations at the wire center make collocation impractical, U S WEST and the CLEC may present their arguments to the Commission. Again, these principles adhere directly to FCC rules. For additional process detail, see Confidential Exhibits TRFS-C11 and TRFS-C12.

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[21] See the FCC's Order, CC Docket No. 98-147, Para. 36.

[22] See the FCC's Order, CC Docket No. 98-147, Para. 30.

U S WEST has also implemented a process where the U S WEST state regulatory attorney or regulatory director provides the Commission with the documentation describing why collocation in a specific central office was denied. In this process, U S WEST will provide the Commission with detailed floor plans or diagrams of any premises where physical collocation was not practical because of space limitations. Subject to any protective order, a CLEC may request that U S WEST provide copies of this information through their Account Manager. For additional process detail, see Confidential Exhibits TRFS-C11 and TRFS-C12.

As required by the FCC, U S WEST also maintains a publicly available document, posted for viewing on the Internet, indicating all premises that are known to be full. U S WEST updates this document within ten days of the date when it learns that a premises is out of physical space for collocation.[23] The internet address is:

http://www.uswest.com/carrier/bulletins/collocation-bulletins/colosum599.html.

If U S WEST denies a request for collocation due to lack of space, Section 8.2.1.14 of the SGAT states that a CLEC may request that U S WEST remove obsolete, unused equipment, in order to facilitate the creation of additional collocation space within a central office. Again, this adheres directly to FCC rules. U S WEST also proactively reviews central office space for obsolete or unused equipment prior to collocation denial. For additional process detail, see Confidential Exhibits TRFS-C11 and TRFS-C12

Finally, U S WEST provides CLECs with the same network connections as U S WEST uses to provision services to its own retail customers. CLEC terminations share frame space with U S WEST terminations without a requirement to also

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[23] See the SGAT, Section 8.2.1.13, Out of Space Document.

traverse an intermediate device, such as an ICDF or SPOT (Single Point of Termination) frame. A direct connection between the collocation space and the same digital cross-connect frame terminating similar retail services can be provisioned without a bona fide request. The direct connection product is described in the U S WEST Interconnection and Resale Resource Guide, Issue D of Technical Publication 77386 and in the Arizona SGAT at Section 8.2.1.24. If desired, a CLEC may request a tour of the U S WEST building and may request demarcation on various frames.[24]

Three Step Collocation Provisioning Process

Upon receipt of a collocation request, U S WEST performs the following three steps in the provisioning process:

Feasibility Study – First, U S WEST provides the CLEC with a study of the feasibility of providing collocation pursuant to the CLEC's request at a particular site. In accord with the terms of the SGAT, U S WEST typically provides the feasibility study to CLECs within seven calendar days of the CLEC's initial request for virtual collocation[25], and within ten calendar days for physical collocation.[26] If the CLEC's first choice for collocation is not available (e.g., caged physical), the study will determine the feasibility of the CLEC's second choice (e.g., cageless physical), as described by the CLEC in its initial request.

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[24] See the SGAT, Section 8.2.1.24 – 8.2.1.26, CLEC Connections to the U S WEST Network.

[25] SGAT, Section 8.4.2.1.

Quote Preparation – Second, if the CLEC's collocation request is found to be feasible, U S WEST provides the CLEC with a quotation of the charges associated with the specific request typically within 25 calendar days of the completion of the feasibility study.[27] A CLEC has thirty days to accept a quote with a down payment.

Installation – Third, upon down payment of the Quote Preparation Fee and 50% of the non-recurring charges for the collocation installation and, in the case of virtual collocation, receipt of the CLEC's equipment to be collocated, U S WEST commences installation of the collocation arrangement. While there are exceptions, the standard interval from installation to completion is 90 days. [28]

The collocation process described above is included in the SGAT.[29] These provisions demonstrate U S WEST's legal obligation to provide collocation. Specifically, Section 8.4 of the SGAT includes the specifics concerning the collocation ordering process and intervals. For additional process detail, see Confidential Exhibits TRFS-C13 and TRFS-C14.

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[26] SGAT at Section 8.4.3.1.

[27] SGAT at Sections 8.4.2.1 and 8.4.3.1.

[28] SGAT at Sections 8.4.2.2 and 8.4.3.1.

[29] See the SGAT, Section 8.0, Collocation.

U S WEST offers collocation on a first-come, first-served basis.[30] If a request for collocation is denied due to lack of space, that CLEC will be offered a number of alternatives. Alternative collocation options include: (1) a lesser amount of space that is determined to be available in relation to the original request; (2) a cageless physical collocation (bay-at-a-time); or (3) virtual collocation. A CLEC may also request space reclamation such as removal of non-working equipment or the moving of working circuits to other equipment for the purpose of providing additional collocation space or conditioning or reconditioning of space for the placement of equipment. For additional process detail, see Confidential Exhibits TRFS-C11 and TRFS-C12

Five departments within U S WEST are dedicated to more efficient collocation processes. The Infrastructure Availability Center project manages each collocation order, from initial inquiry to completion. The Common Systems Planning and Engineering Center provides subject matter expertise for feasibility studies. The Interoffice Facilities Capacity Provisioning center is responsible for design engineering, walk-throughs, and records updating of collocation jobs. The Network Electronics Purchasing group supplies collocation services including procurement, end-to-end customer service, promise-ship data, delivery confirmation and installation problem resolution. Finally, the State Interconnection Manager group supports account teams when tutoring, escalation and inspection is required. Every Wednesday, the status of each state's collocation jobs due in the next 30/60/90 days are reviewed in a multi-department meeting. This meeting includes front-line and senior managers from several departments at U S WEST. Collocation projects that are in jeopardy or on-hold are discussed.

In these five departments, U S WEST dedicates over 200 employees to collocation request satisfaction. At least as many employees from other departments

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[30] See the SGAT, Section 8.2.3.2, Space Allocation.

spend some portion of their time on collocation provisioning. U S WEST will expand further, as required, to accommodate the collocation needs of the CLECs.

Collocation Performance Measures

Just as U S WEST provides performance measures for interconnection, it also provides performance measures for collocation. These measures were also developed in this 271 process. Unlike interconnection where there is a retail parity standard, however, U S WEST does not collocate its own central office equipment. Where no comparison to retail is possible, U S WEST must establish that it provides "an efficient CLEC with a meaningful opportunity to compete." U S WEST tracks a number of collocation results to establish that it offers collocation such that efficient competitors has a meaningful opportunity to compete. These collocation measures correspond to each of the three steps in the collocation process. Specifically, U S WEST measures the average time it takes to provide CLECs with feasibility studies, quotes, and installations. U S WEST also tracks the percentage of feasibility studies, quotes, and installations that it completes on or before the scheduled due date. Because there is no retail comparative, "performance benchmarks" -- a certain level of performance that CLECs agree would provide them with a meaningful opportunity to compete have been established. Just as with retail parity, if U S WEST meets or exceeds these benchmarks, the Commission has no performance issues to review.[31] It is only if U S WEST performance falls below the benchmarks that additional investigation must be performed.

Collocation Feasibility

Section 8.4.3.1 of the SGAT requires U S WEST to perform collocation feasibility studies within ten days. The Feasibility Interval begins when U S WEST receives and

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[31] Bell Atlantic Order at ¶ 44.

accepts a valid/accurate collocation order, and ends when that the feasibility study response is provided to the CLEC by U S WEST. The day an order is received is day zero. The next business day, typically the day when the order is reviewed and deemed valid/accurate during a validation call with the CLEC, is counted as day one. If, during the validation call, the order is deemed invalid/inaccurate, it is returned to the CLEC so that the necessary corrections can be made. The CLEC can then resubmit the order to U S WEST to restart the process. Further information regarding the Collocation Feasibility Interval Measure (CP-3) and the Collocation Feasibility Commitments Met Measure (CP-4) are found in Confidential Exhibit TRFS-7 through TRFS-10 of this affidavit.

U S WEST's actual performance in providing collocation feasibility is universally positive. The PIDs state that U S WEST meets its obligations if 1) 90% of all feasibilities are provided to the CLEC within the 10-day interval, and 2) the average feasibility interval is less than 10 days. For each of the collocation feasibility measures, U S WEST consistently met or exceeded the performance benchmarks set by the Commission. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

Collocation Quote

The standard U S WEST interval for delivering CLECs with a collocation quote is twenty-five calendar days. The Collocation Quote Interval begins the day after U S WEST delivers the feasibility study result to the CLEC, and ends when U S WEST delivers the quote to the CLEC. This rule does not apply to interconnection agreements with a 21-day combined feasibility/quote interval, as those intervals begin when U S WEST accepts a valid order, and ends when U S WEST delivers the quote to the CLEC.

U S WEST's actual performance in providing collocation quotes is also positive. The PIDs state that U S WEST meets its obligations when 1) 90% of all quotes are provided to the CLEC within the 25-day interval, and 2) the average quote interval is less than 25 days. For each of the collocation quote measures, U S WEST routinely met or exceeded the performance benchmarks set by the Commission. Because U S WEST has met the Commission's benchmark on these measures, no Commission analysis is required.

Collocation Installation

The last component of collocation is installation of the collocation arrangement. While there are exceptions, the standard U S WEST interval for physical and virtual collocation installation is ninety calendar days. The actual interval is tracked as performance measure CP-1. The interval begins on the day U S WEST receives the 50% down payment, and ends on the day the CLEC is notified that the U S WEST Installation Standards and associated Technical Publications requirements are met. U S WEST also tracks as CP-2, the percentage of time that it completes the installation on time. This collocation "Commitments Met" indicator is not reported as met until the U S WEST State Interconnection Manager conducts a "walk through" of the space and documents the CLEC's acceptance of the space. Walk-throughs typically occur the business day following the installation completion.

If, during the walk-through, the CLEC does not accept the collocation, the completion date is removed to indicate that the installation is not yet complete. When the CLEC finally accepts the collocation, the actual "complete" date will be posted, and then the Commitments Met and Interval measures will be calculated and reported based on the extended U S WEST interval. U S WEST has retroactively corrected completion dates to reflect any revised deviation situation that has occurred.

When a significant change to a U S WEST central office is identified during the feasibility phase as necessary to accommodate a CLEC's collocation request (e.g., a power addition or wall removal), the "Commitments Met" measure will be determined based on the negotiated Ready-For-Service (RFS) date. U S WEST will document "Significant change" special requests to justify the exclusion of the interval from the performance measurement calculation.

U S WEST will place a collocation project on "CLEC Hold" if U S WEST is unable to proceed with the collocation feasibility, quote, or installation due to the lack of required information or equipment from the CLEC. The appropriate U S WEST Account Team will communicate the CLEC Hold status to the CLEC and document the status in its records. U S WEST's notification will inform the CLEC of the specific information or equipment required. U S WEST will then provide the CLEC with 24 hours to respond during the feasibility and quote phases or 48 hours during the installation phase.

A CLEC Hold can also occur at the very end of the installation phase when U S WEST has completed all of its work and is waiting for CLEC equipment. In this case, the project will be immediately placed on CLEC Hold and the CLEC will be notified of the status by the U S WEST Account Team. Once the CLEC equipment is delivered, U S WEST releases the project from CLEC Hold status, and typically schedules the final work to be completed within 21 calendar days.

Consistent with collocation feasibility and quotes, U S WEST's actual performance in providing collocation installation is also positive. The PIDs state that U S WEST meets its obligations provided that 1) 90% of all installations complete within the 90-day interval, and 2) the average installation interval is less than 90 days. For each of the collocation installation measures, U S WEST routinely met or exceeded the performance benchmarks set by the Commission. Because U S WEST

has met the Commission's benchmark on these measures, no Commission analysis is required.

These results provide compelling evidence that U S WEST is providing collocation to CLECs in a timely manner and in quantities that provide CLECs with a reasonable opportunity to compete.

Collocation Summary

U S WEST has satisfied the requirements of the Act, and the FCC with respect to collocation. U S WEST has a concrete and specific legal obligation to provide collocation as referenced in the U S WEST SGAT and the various interconnection agreements between U S WEST and the CLECs in Arizona. U S WEST has developed specific procedures to implement collocation. Utilizing hundreds of trained personnel, U S WEST's centers coordinate and fulfill the huge demand for CLEC collocation every day in Arizona. In Arizona as of April 30, 2000, U S WEST was providing 225 units of physical collocation and 32 units of virtual collocation to 25 CLECs in 61 buildings. The sheer volumes of collocations provisioned demonstrates that U S WEST provides CLECs in Arizona with collocation as required by the Act. U S WEST stands ready to provide additional collocation to CLECs in Arizona in accordance with these requirements pursuant to the terms of the U S WEST SGAT. For example, as of June 26, 2000, U S WEST was on schedule to complete pending requests for 90 physical, 124 cageless and 7 virtual pending requests for space, with only 2 backlogged jobs.

U S WEST has presented *prima facie* evidence that the procedures it has in place for providing collocation to CLECs ensured that the requirements of the Act and the FCC rules have been satisfied in the past and will continue to be satisfied in the future. U S WEST's collocation processes, procedures and capabilities ensured that an efficient competitor was afforded a reasonable opportunity to compete. This is

borne out by U S WEST's actual performance data which universally shows that U S WEST routinely meets and exceeds the collocation performance expectations set by this Commission.

Based on this evidence, I urge the Arizona Commission to find that U S WEST has satisfied the collocation requirements of Checklist Item 1 of Section 271(c)(2)(B)(i) of the Telecommunications Act of 1996.

CONCLUSION

For the reasons described in my supplemental affidavit, the Arizona Commission should find that U S WEST has satisfied Checklist Item 1, which concerns interconnection trunking and collocation.

BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN
CHAIRMAN
TONY WEST
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

IN THE MATTER OF U S WEST COMMUNICATIONS, INC'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996	)	DOCKET NO. T-00000B-97-0238

EXHIBITS OF

Thomas R. Freeberg

U S WEST COMMUNICATIONS

June 30, 2000

INDEX OF EXHIBITS

DESCRIPTION	EXHIBIT
Qualifications of Mr. Thomas R. Freeberg	TRFS-01
Confidential Exhibit of Interconnection LIS Trunks	TRFS-C2
Confidential Exhibit of Interconnection Collocation	TRFS-C3
Trunking Provisioning Performance Measurements	TRFS-C4
Trunking Repair Performance Measurements	TRFS-C5 Trunk
Blocking Performance Measurements	TRFS-C6 New
Collocation Perf. Measurements (excl. cageless)	TRFS-C7
Collocation Augment Perf. Measurements (excl. cageless)	TRFS-C8
New Cageless Collocation Perf. Measurements	TRFS-C9
Cageless Augment Collocation Perf. Measurements	TRFS-C10
Out of Space Micro Process	TRFS-C11
Out of Space Macro Process	TRFS-C12
Feasibility Micro Process	TRFS-C13
Feasibility Macro Process	TRFS-C14
BFR Process	TRFS-C15

QUALIFICATION OF THOMAS R. FREEBERG

I hold a Bachelor of Science degree in Civil Engineering from the University of Minnesota, Institute of Technology and am a Registered Professional Engineer in the state of Minnesota, License Number 16738 MN. Other than a two-year break, I have worked for U S WEST since 1979 in various engineering, construction, administration, planning, and operations positions. As part of U S WEST's construction operation, I directly supervised cable placement and splicing for interoffice and loop facilities. As part of U S WEST's order provisioning operation, I directly supervised order administrators and facilities specialists who maintained records of idle and working cable and electronics inventories as orders processed. As part of U S WEST's engineering operation, I drafted blueprints for outside plant augments, I ran computer models comparing the economics of various network augment options (switching, loop and transport), and I developed the cost portion of business cases for potential new services. Finally, as part of U S WEST's wholesale operation, I directly supervised the development and documentation of provisioning and maintenance processes associated with new resale, interconnection, and unbundled local services. These efforts were intended to ensure that basic provisioning and maintenance was in place to support the initial rollout of local wholesale services.

EXHIBITS C2 Through C15

PROPRIETARY AND CONFIDENTIAL

(REDACTED VERSION)